

Exhibit 1: Declaration of Peter E. Berlowe

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

Case No. 1:22-cv-22171-JEM

**MICHAEL J. FITZGERALD,
Individually, and YELANY DE VARONA,
Individually**

Plaintiffs,

v.

**RONDA MCNAE, individually, and
WILLIAM MCNAE, individually,**

Defendants.

_____ /

**DECLARATION OF PETER E. BERLOWE IN
SUPPORT OF PLAINTIFF MICHAEL J. FITZGERALD'S
REQUEST FOR FEES AND COSTS**

I, Peter E. Berlowe, Esq., pursuant to 28 U.S.C. § 1746, give this sworn declaration and state:

1. My name is Peter E. Berlowe and I have personal knowledge as to all the facts set forth herein.

2. I was admitted to the Florida Bar in 1998, and am currently a member in good standing. I am admitted to practice law before the United States District Courts in and for the Southern, Middle, and Northern Districts of Florida. I am also admitted to practice law before the Eleventh Circuit Court of Appeals and the United States Supreme Court. I am a Florida Qualified Arbitrator and former Florida Supreme Court Certified Mediator. My practice consists mainly of complex commercial litigation and intellectual property litigation.

3. I am presently employed with, and a shareholder of, the law firm of Assouline & Berlowe, P.A., and in the scope of my duties have been assigned the responsibilities of

representing Plaintiff Michael J. Fitzgerald (“Fitzgerald”) against Ronda McNae (“Defendant” or “McNae”) in **Case No. 1:22-cv-22171-JEM** (the “Litigation”).

4. I, along with the other attorneys of my firm, including partners and associates, have represented Fitzgerald in the Litigation against McNae, including preparation for trial on damages, handling post-trial legal issues, legal research, formulation of case strategy, conducting discovery (in Florida and Washington), drafting and filing dozens of motions and responsive briefs.

5. Fitzgerald is entitled to recover all reasonable attorneys’ fees and taxable costs against McNae incurred from July 8, 2022 to May 5, 2025 and beyond due to the extensive nature of the prevailing party attorneys’ fees provision in the Confidential Settlement Agreement between Fitzgerald and McNae.

6. Copies of my biography, as well as those of Meredith J. Gussin, Eric N. Assouline, Peter A. Koziol, Ellen M. Leibovitch, Francisco J. Barreto, Daniel B McCain, Veronique Malebranche, and Andres J. Caldera, are attached hereto as **Exhibits A through I**, respectively.

7. From July 8, 2022 to May 5, 2025, the attorneys and paralegals with Assouline & Berlowe, P.A. have performed at least 3,024.99 hours of work on this case at the hourly rate of \$550.00 for partners, \$500.00 for Of Counsel attorneys, \$300.00-\$400.00 per hour for associates, and \$125.00 per hour for paralegals, for a total of \$1,571,380.00, which is summarized as follows:

<u>Time Keeper</u>	<u>Hours</u>	<u>Hourly Fee</u>	<u>Total</u>
Peter E. Berlowe (<i>See <u>Exhibit A</u></i>)	1,377.70	\$550.00	\$785,565.00

Meredith J. Gussin (See <u>Exhibit B</u>)	1,455.09	\$500.00	\$732,895.00
Eric N. Assouline (See <u>Exhibit C</u>)	1.80	\$550.00	\$990.00
Peter A. Koziol (See <u>Exhibit D</u>)	5.50	\$550.00	\$3,025.00
Ellen M. Leibovitch (See <u>Exhibit E</u>)	0.50	\$550.00	\$275.00
Francisco J. Barreto (See <u>Exhibit F</u>)	48.10	\$400.00	\$19,240.00
Daniel B. McCain (See <u>Exhibit G</u>)	48.10	\$400.00	\$19,240.00
Veronique Malebranche (See <u>Exhibit H</u>)	20.8	\$400.00	\$8,320.00
Andres J. Caldera (See <u>Exhibit I</u>)	6.10	\$300.00	\$1,830.00
		Total	\$1,571,380.00

8. From July 8, 2022 to April 16, 2025, Fitzgerald has incurred at least \$71,790.97 in reimbursable costs in this litigation for which it seeks to be compensated pursuant to the parties' contract and 28 U.S.C. § 1920 as follows:

<u>Date</u>	<u>Description, Vendor, Invoice #</u>	<u>AMOUNT</u>	<u>Subsection of 28 USC §1920</u>
3/31/2025	Fiske Forensic Accounting: Invoice # 38149.	\$10,100.00	(6)
3/27/2025	Esquire Deposition Solutions: Transcription of multiple audio files	\$440.15	(2)
11/12/2024	Process Server, Inc. (PSI): Service Patrice Sanchez; Process Server Inc., Invoice #JAC-2023003750	\$270.00	(3)
11/12/2024	Process Server, Inc. (PSI): Service Patrice Sanchez; Process Server Inc., Invoice #JAC-	\$394.00	(3)

2023003751

8/22/2023	Esquire Deposition Solutions: Invoice INV25461834 of \$250.00 re: Abigail Leonard Remote Video (2 hours) taken 7/26/2023.	\$250.00	(2)
8/22/2023	Esquire Deposition Solutions: Invoice INV25462144 of \$867.20 re: Abigail Leonard Deposition taken 7/26/2023.	\$867.20	(2)
8/21/2023	Coastal Reporting Inc., Statement for invoices: 12050, 12072,12077 re: Transcript. (EO emailed to client for direct payment 7/18/2023).	\$3,005.10	(2)
8/21/2023	Esquire Deposition Solutions: Invoice INV2541724 of \$1,323.25 re: Patrice Sanchez Taken 7/13/2023.	\$1,323.25	(2)
8/21/2023	Esquire Deposition Solutions: Invoice INV2549145 of \$190.00 re: James Warren Hopper Taken 7/27/2023.	\$190.00	(2)
8/21/2023	Esquire Deposition Solutions : Invoice # INV2543591 of \$370.00 re: Dr. Ho Deposition taken 7/28/2023.	\$370.00	(2)
8/21/2023	Esquire Deposition Solutions: Invoice INV2538283 of \$625.00 re: Patrice Sanchez VIDEO Taken 7/23/2023.	\$625.00	(2)
8/21/2023	Esquire Deposition Solutions: Invoice INV2535078 of \$250.00 re: Abigail Leonard Remote Video Cancellation 7/14/2023.	\$250.00	(2)
8/21/2023	Esquire Deposition Solutions: Invoice INV2535083 of \$175.00 re: Abigail Leonard Cancellation 7/14/2023.	\$175.00	(2)
8/4/2023	James W. Hopper (Expert Witness Fee) for the remainder of his depo fee in Fitzgerald McNae.	\$400.00	(6)
8/4/2023	Dr. Judy Ho \$562.50 for her expert depo fee (part 2) in Fitzgerald/McNae.	\$562.50	(6)
8/4/2023	Coastal Reporting Inc.: For a Deposition Transcript of Kim Fromme. Check #30071	\$444.50	(2)
7/27/2023	Dr. Judy Ho for (Expert Fee) Expert Witness Deposition Fee	\$1,500.00	(6)
7/25/2023	James Hopper (Expert Fee) for Deposition fee.	\$1,200.00	(6)
7/19/2023	Steinotype, Inc.: Invoice # 23-156 re: Deposition of Michael DiTomasso, Ph.D. taken July 11, 2023.	\$967.75	(2)

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7/14/2023	Esquire Deposition Solutions : Invoice for Abigail Leonard #INV2535083	\$175.00	(2)
7/14/2023	Esquire Deposition Solutions Invoice for Abigail Leonard- Remote Video Cancellation #INV2535078.	\$250.00	(2)
7/5/2023	Esquire Depositions Solutions: Invoice # INV2523658 of \$612.50 re: Videos Deposition of Matthew Mead Taken 6/12/2023. Forwarded to client for direct payment on 7/5/2023.	\$612.50	(2)
6/30/2023	Esquire Deposition Solutions: Invoice # INV2521281 of \$1,051.00 re: Transcripts of Matthew Mead Deposition on 6/12/2023- Forward to client for direct payment.	\$1,051.00	(2)
6/30/2023	Fiske Forensic Accounting: Invoice # 34455.	\$18,051.50	(6)
6/22/2023	Process Server, Inc. Out Of State Svc. Texas Witness Fee Check Patrice Sanchez	\$190.00	(3)
6/7/2023	Fiske Forensic Accounting: Invoice # 34296.	\$862.50	(6)
5/31/2023	Fiske Forensic Accounting: Invoice #34263.	\$15,894.50	(6)
5/25/2023	Fiske Forensic Accounting: Invoice # 34226.	1,125.00	(6)
5/19/2023	US Legal Support: Invoice # 20230425940-12 re: Transcripts of Azaiah Carew 3 hour deposition.	\$2,130.70	(2)
5/18/2023	Process Server Inc. (PSI): Invoice # JAC-2023003694 - Service of CHURCHHOME.	\$150.00	(3)
5/18/2023	US Legal Support: Invoice # 2023042678-12 re: Transcripts of Marissa Carew 3 hour deposition.	\$1,994.00	(2)
5/17/2023	Blacks Copy Invoice # 23109 of \$248.35 re: PDF Production.	\$248.35	(3)
5/15/2023	Esquire Deposition Solutions : Invoice INV2482060 re: Deposition Transcript of Ronda McNae. Client paying directly to vendor.	\$1,765.00	(2)
5/15/2023	Process Server Inc. (PSI): Invoice # JAC-2023003749 - Service of Microsoft Corporation.	\$150.00	(3)
5/10/2023	Esquire Deposition Solutions : Invoice INV2478933 re: Deposition Transcript of William McNae.	\$4,616.65	(2)
5/2/2023	Esquire Deposition Solutions : Invoice INV2471971 of \$718.30 re: Lily Vasquez Deposition Take 4/14/2023.	\$718.30	(2)
4/30/2023	Fiske Forensic Accounting: Invoice # 33901.	\$8,216.00	(6)
4/21/2023	Blacks Copy: Invoice # 23044.	\$2,738.43	(3)

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4/11/2023	SD Fla.: Hearing Transcript James C. Pence-Aviles, United States District Court.	\$272.50	(2)
3/31/2023	Coastal Reporting: Invoice # 12077 re: Video Deposition of Tom Wiper.	\$548.00	(2)
3/30/2023	Costal Reporting: Invoice 12072 re: Continued Michael Fitzgerald Deposition Transcripts.	\$794.60	(2)
3/22/2023	Costal Reporting: Invoice 12050.	\$1,211.00	(2)
3/14/2023	Process Server, Inc. (PSI): Invoice JAC-2023001770 of \$150.00 re: Northwest University.	\$150.00	(3)
3/9/2023	Process Server, Inc. (PSI): Invoice JAC-2023001769 of \$150.00 re: Azaiah Carew of \$150.00 3/9/2023. Served.	\$150.00	(3)
3/3/2023	Process Server, Inc. (PSI): JAC-202300807 PSI Invoice Re: Carew, Azaiah. Non Service.	\$150.00	(3)
2/24/2023	Process Server, Inc. (PSI): Invoice # JAC-20230000806 re: Tami Wakasugi.	\$150.00	(3)
2/23/2023	Process Server, Inc. (PSI): Invoice # JAC-202300804 re: Served Document of Sirena Herd.	\$150.00	(3)
2/22/2023	Process Server, Inc. (PSI): Process Servers, Inc. Invoice JAC-202300805 re: Ali Sametti.	\$150.00	(3)
2/20/2023	iMazing Devise Order # 46526949 re: Subpoena to Sarah Dellinger/Equip Counseling.	\$34.99	(2)
2/17/2023	Esquire Deposition Solutions: Invoice # INV 2401925 of \$902.50 re: Deposition of David Carpenter 1/26/2023.	\$902.50	(2)
2/17/2023	Esquire Deposition Solutions: Invoice # INV 2402585 of \$345.00 re: Digital Video of Deposition of David Carpenter 1/26/2023.	\$345.00	(2)
1/12/2023	Process Server, Inc. (PSI): Invoice No. JAC2022009576 service on Sarah Dellinger	\$280.00	(2)
1/12/2023	Process Server, Inc. (PSI): Invoice No. JAC2022009579 service on Brock Weedman	\$280.00	(2)
1/3/2023	Process Server, Inc. (PSI): Inv JAC2022009579 service upon Brock Weedman	\$280.00	(2)
12/29/2022	Process Server, Inc. (PSI): process service JAC2022009499 on Onsite Workshop	\$150.00	(3)
12/29/2022	Process Server, Inc. (PSI): Inv JAC2022009807 service upon Lilly Vasquez 12/29/2022	\$150.00	(3)
12/5/2022	Process Server, Inc. (PSI): process non-service JAC202200911 on Lilly Vasquez	\$150.00	(3)

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7/22/2022	Process Server, Inc. (PSI): rush service on McNae Invoice # JAC-2022005183.	\$280.00	(3)
7/14/2022	SD Fla. Complaint filing fee	\$402.00	(1)
		<u>\$71,790.97</u>	

9. Attached hereto as **Composite Exhibit J** is a true and correct summary of the attorney and paralegal time sheets from Assouline & Berlowe, P.A. that correspond with the attorneys' hours and fees summarized in the above fee table. Also attached as **Composite Exhibit K** are true and correct copies of the invoices from the various vendors for which Fitzgerald is entitled to reimbursement as cost of this litigation.

10. The records attached as **Composite Exhibit J and K** were made at or near the time the services were provided by — or from information transmitted by — the time keeper with the most knowledge of that service.

11. The records attached as **Composite Exhibit J and K** were kept in the course of a regularly conducted activity of the business of Assouline & Berlowe, P.A.

12. The making of the records attached as **Composite Exhibit J and K** were a regular practice of the law firm Assouline & Berlowe, P.A. for its provision of legal services.

13. It is a regular part of Assouline & Berlowe, P.A.'s business practice to keep and maintain records of the type in **Composite Exhibit J and K**.

14. The records attached as **Composite Exhibit J and K** were retrieved from the electronic time-keeping files of Assouline & Berlowe, P.A.

15. I swear that the records attached as **Composite Exhibit J and K** are complete and accurate copies of originals as maintained in the ordinary course of conducting business at Assouline & Berlowe, P.A.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 8, 2025

/s/ *Peter E. Berlowe*
Peter E. Berlowe, Esq.

Exhibit A: Peter E. Berlowe C.V.

Miami: (305) 567-5576

Fort Lauderdale: (954) 929-1899

Boca Raton: (561) 361-6566

ASSOULINE & BERLOWE THE BUSINESS LAW FIRM

AWARDED DBR LITIGATION DEPARTMENT OF THE YEAR
REAL ESTATE AND OTHER LITIGATION (SMALL FIRM CATEGORY)

Peter E. Berlowe
Partner

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Miami, Florida 33131**



Peter E. Berlowe is co-founder of the firm in the Miami office. He heads the **Corporate and Finance Practice** and is a member of the **Business Litigation & Dispute Resolution Practice**. His practice includes domestic and international litigation and arbitration of: complex commercial disputes; intellectual property, trade secret, and trade disputes; construction disputes; FINRA disputes; hotel management disputes; and complex foreclosure matters.

Mr. Berlowe's practice also includes business consultation and planning regarding construction, trademarks, copyrights, and intellectual property portfolios. He has represented private and public companies and financial institutions, as well as entertainers, sports personalities, fashion designers, publishers, manufacturers, and major airlines.

Mr. Berlowe has litigated construction disputes involving tens of millions of dollars; including representing major financial institutions in construction litigation related to their world and regional headquarters facilities. He has engaged in "bet-the-company" litigation involving substantial antitrust issues; as well as, Department of Justice antitrust clearance procedures of asset purchases out of bankruptcy

litigation. Mr. Penney has organized and led teams of attorneys in document reviews involving millions of pages. Significantly, he handles complex fraud cases involving tens of millions of dollars, where he finds his engineering and mathematics background gives him a unique perspective for following the "money trail."

Education

J.D., University of Miami School of Law, 1998

Magna Cum Laude

Law Review

B.S., North Carolina State University, 1992

Engineering

Bar Admissions

Florida

U.S. Supreme Court

U.S. Court of Appeals 11th Circuit

U.S. District Court Southern District of Florida

U.S. District Court Middle District of Florida

U.S. District Court Northern District of Florida

Memberships, Activities and Affiliations

Dade County Bar Association

Young Lawyers Section.

- Formerly, Board of Directors Member.
- Professionalism Committee. Formerly Chair.
- Law Week Committee. Formerly Vice Chair.
- Schools Committee. Formerly Co-Chair.

Construction Committee

Civil Law Committee. Formerly Member.

Pro-Bono Representation

Pro-bono representation of political refugee in international human rights case

Notable Reported Cases

- All Web Leads, Inc. v. D'Amico, U.S. Dist. LEXIS 200492 (S.D.Fla. 2018)
- Ortega v. Cargil, Inc., Cargil de Venezuela, S.A., WL 1732462 (S.D.Fla. 2016) - remand to state court for untimely removal to federal court.
- Five for Entm't S.A. v. Rodriguez, 646 Fed.Appx. 714 (11th Cir. 2016)
- Nikooie v. JP Morgan Chase Bank, et. al.
- Five for Entm't S.A. v. Rodriguez, (S.D. Fla. 2013)
- Medimport S.R.L. v. Cabreja, 2013 WL 1003625 (S.D. Fla. 2013)
- Medimport, S.R.L. v. Cabreja, 2012 WL 3632580 (S.D. Fla. 2012)
- APP Pharmaceuticals, LLC v. Ameridose, LLC (D.N.J. 2011) pharmaceutical patent infringement action.
- State Rd. 7 Inv. Corp. v. Natcar Ltd. P'ship, 82 So. 3d 1013 (Fla. 4th DCA 2011)
- Stockwire Research Group, Inc., et. al. v. Lebed, et. al., 577 F. Supp. 2d 1262 (S.D. Fla. 2008) – \$2.567 million federal judgement for trademark infringement and infringement and other violations under the Digital Millennium Copyright Act.
- In re Casa Del Rio, LLC, 2007 WL 707035, (Bkrtcy .S.D.Fla. Mar. 7, 2007).

- In re Marriage of Pundak, 2004 WL 1908158 (Fla. Cir. Ct. 2004).
- Applied Card Sys., Inc. v. Mallia, 2006 WL 1908158 (Fla. Cir. Ct. 2004)

Publications, Speeches, and Interviews

- **Stalled Condo Will Be Bought Out of Foreclosure, Restarted** - April 27, 2017 South Florida Business Journal by Brian Bandell
- **Stalled Condo Project Sold at Foreclosure Auction, Deposits Cancelled** - April 25, 2017 South Florida Business Journal by Brian Bandell
- **Hollywood building designed for condos sold at auction, could go rental route** - April 25, 2017 South Florida Sun Sentinel
- **Construction Contracts & Copyright** - February 29, 2017 - Presentation to the American Institute of Architects, Miami Chapter, regarding registration of construction plans with the United State Copyright Office and Reservation of Copyrights to the architect in construction contracts.
- **Panama Papers Reports Show Daddy Yankee Might Have a Way to Pay Millions Owed** - April 15, 2015 Daily Business Review Article by Monica Gonzalez Mesa
- **Ex-Worker Sues Cargill After Severance Was Paid in Bolivars** - July 22, 2015 Daily Business Review article by Julie Kay.
- **Attorneys Focus on Timing of Payment for \$6.4 Million Judgment Against Music Star Daddy Yankee** - January 2, 2014 Daily Business Review Article by John Pacenti.
- **Suspended Attorney Target of Mortgage Lender's Lawsuit** - August 5, 2009 Daily Business Review article by Billy Shields.
- **Lorman Educational Services Seminar on Foreclosure and Repossession In Florida State**, RE: Bankruptcy Courts' Dismissal of Foreclosure-Related Chapter 11 Bankruptcies. Peter E. Berlowe, Laura Berlowe-Heinish and Peter A. Koziol, Protection of the Moral Rights of the Digital Graphic Artist, Florida Bar Journal (2007), republished in 25 The Computer & Internet Lawyer 21 (2008).
- **Intellectual Property Roundtable 2006**: Corporate Intellectual Property Compliance Programs (November 2006) Sponsored by Daily Business Review.
- **Interview on Sky Radio** - February 2006 Interview with Sky Radio regarding the importance of companies implementing and maintaining an Intellectual Property Compliance Program.
- **Homes At Risk** - June 11, 2000 Miami Herald article by Peter J. Whoriskey.

Previous Experience

Shutts & Bowen LLP, Business Litigation Practice Group
Weil, Gotshal & Manges, LLP, Litigation Department

Designations

- Florida Qualified Arbitrator

Honors and Rankings

- 2019 Named to America's Top 100 High Stakes Litigators
- 2018 Daily Business Review's Litigation Department of the Year, Small Firm: Real Estate & Other Litigation, Department Head



- Creditors Rights & Bankruptcy
- Labor and Employment
- Succession Planning
- Business Litigation and Dispute Resolution
- International Law and Arbitration
- Intellectual Property
- Corporate and Finance
- Real Estate

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We serve the following localities: Miami-Dade County including Coral Gables, Cutler Bay, Doral, Hialeah, Homestead, Kendall West, Miami, Tamiami, The Hammocks, and Westchester; Orange County including Orlando and Winter Park; Osceola County including Kissimmee, Poinciana, and St. Cloud; Palm Beach County including Belle Glade, Lake Worth, and West Palm Beach; and Broward County including Cooper City, Fort Lauderdale, Hollywood, Miramar, Pembroke Pines, Sunrise, and Weston.

Peter E. Berlowe | Miami Corporate Finance Lawyers Assouline & Berlowe

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Exhibit B: Meredith J. Gussin C.V.

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REAL ESTATE AND OTHER LITIGATION (SMALL FIRM CATEGORY)

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Of Counsel

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Meredith Gussin is Of Counsel to the Firm and a resident of the Miami office. She is a member of our Litigation & Dispute Resolution Practice. Prior to re-joining the Firm, Meredith served as the Director of Human Resources and General Counsel to a group of restaurant franchises. In the role of General Counsel, Meredith oversaw all aspects of the franchise's business and legal matters, including litigation, Americans with Disabilities Act (ADA) compliance lawsuits, franchise agreement review and negotiations, various employment related issues, Covid regulation issues, CARES Act compliance, and other related transaction matters, to name a few. Meredith gained exceptional experience in the restaurant and hospitality business, and is equipped to handle negotiations and litigation in the restaurant and franchise field.

Education

J.D., University of Miami School of Law, 2001

Miami Scholars Program

University of Miami Law Review, published.

B.A., University of Michigan, 1997

Major, English

Bar Admissions

Florida Bar

Work Experience

Left Field Management, LLC

General Counsel/Director of Human Resources. 2012-2022

Eric Virgin, P.A.

Of Counsel. 2011-2012

Assouline & Berlowe,
Of Counsel. 2007-2011
Carlton Fields, P.A.
Litigation Associate. 2002-2007
Genovese Joblove & Batista, P.A.
Litigation Associate. 2001-2002

Philanthropic Experience

The Children's Fund for Glycogen Storage Disease Research
Board Member, 2012-present
Fundraising Chairperson, 2013-present
Temple Beth Am Youth Engagement and Religious School
Board Member, 2022



Assouline & Berlowe, P.A.

Practice Areas

Creditors Rights & Bankruptcy
Labor and Employment
Succession Planning
Business Litigation and Dispute Resolution
International Law and Arbitration
Intellectual Property
Corporate and Finance
Real Estate

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We serve the following localities: Miami-Dade County including Coral Gables, Cutler Bay, Doral, Hialeah, Homestead, Kendall West, Miami, Tamiami, The Hammocks, and Westchester; Orange County including Orlando and Winter Park; Osceola County including Kissimmee, Poinciana, and St. Cloud; Palm Beach County including Belle Glade, Lake Worth, and West Palm Beach; and Broward County including Cooper City, Fort Lauderdale, Hollywood, Miramar, Pembroke Pines, Sunrise, and Weston,

Meredith J. Gussin | Florida Litigation Lawyers Assouline & Berlowe

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Exhibit C: Eric N. Assouline, C.V.

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ASSOULINE & BERLOWE

THE BUSINESS LAW FIRM

AWARDED DBR LITIGATION DEPARTMENT OF THE YEAR
REAL ESTATE AND OTHER LITIGATION (SMALL FIRM CATEGORY)

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Eric N. Assouline is a co-founder of the firm, a litigation partner in the Miami and Ft. Lauderdale offices, and he is the head of the Business Litigation Practice. His practice focuses on: bankruptcy and creditors' rights litigation; complex business litigation; intellectual property and real estate litigation;.

Mr. Assouline has represented individuals, private, and public companies in hundreds of cases in state, federal, and bankruptcy courts throughout the State of Florida, primarily at the trial court level, but often also on appeal. He has also appeared pro hac vice, litigating many cases in other states and jurisdictions, as well as acting as local counsel to out-of-state attorneys needing counsel in Florida in state, federal, and bankruptcy courts.

Mr. Assouline has been lead litigation counsel to both national and international clients for many contested commercial and bankruptcy matters, representing landlords, lenders, and suppliers of goods, and involving the application of various articles of the Uniform Commercial Code, including complex and intricate provisions of Article 2 for Sales, and Article 9 for Secured Transactions. He has represented clients in disputes involving real estate partition and acquisition related litigation. And, he has handled several contested commercial landlord tenant lease litigation matters. Mr. Assouline has also litigated a number of creditors' rights matters, through the trial courts in state, federal, and bankruptcy courts, and including post-judgment domestic and international enforcement and Florida Statute § 56.29 proceedings supplementary.

Mr. Assouline has extensive experience in the area of Ponzi scheme litigation. He has been the lead litigation attorney prosecuting fraudulent transfer actions on behalf of a federal court appointed receiver seeking to recover transfers from third parties in state, federal, and bankruptcy courts. He has defended claims against court appointed receivers of financial and insurance companies in various state and federal court cases. He has also defended numerous individuals and companies from bankruptcy trustee initiated adversary proceeding avoidance preferential transfer and fraudulent transfer actions under 11 U.S.C. §§ 547 and 548.

Mr. Assouline's dispute resolution practice also involves mediation and arbitration. He has represented parties before the American Arbitration Association; been appointed by Broward County Judges to preside as the Arbitrator in many Circuit Court cases; and, by agreement of the parties, he has served as the Mediator on banking litigation cases.

Mr. Assouline has also served as an expert witness for many attorneys' fees disputes.

Notable Reported Cases

- *Donatelli v. Donatelli, Inc. v. Rohalim, Inc.*, 230 F.3d 18 (4th Cir. 2001), 2001 WL 1003 (Bankr. S.D. Fla. Apr. 1, 2019)
- *Callado v. Giltitz*, 238 So. 3d 252 (Fla. 3d DCA 2017)
- *Rives v. Ounze Corp., LLC*, No. 17-21467-CIV, 2017 U.S. Dist. LEXIS 130830 (S.D. Fla. Aug. 15, 2017)
- *Aces Risk Mgmt. Corp. v. TMG Portfolio Advisors, Ltd. Liab. Co.*, No. 17-CV-61210, 2018 U.S. Dist. LEXIS 86714 (S.D. Fla. May 22, 2018)
- *News Am. Mktg. FSI LLC v. Four Corners Direct, Inc.*, 192 F. Supp. 3d 1277 (M.D. Fla. 2016)
- *Bronstein v. Zur*, 207 So. 3d 882 (Fla. 3d DCA 2016)
- *Smyth v. Coe*, 178 So. 3d 419 (Fla. 4th DCA 2015)
- *State Road 7 Investment Corp. v. Natcar Ltd. Ptshp.*, 83 So.3d 1013, (Fla. 4th DCA 2011)
- *In re Museum Plaza Holdings, LLC*, 2011 WL 2637201 (S.D.Fla. Bankr. 2011)
- *In re Esquenazi*, 2010 WL 4352504 (S.D.Fla. Bankr. 2010)
- *In re DV8, Inc.*, 435 B.R. 738 (S.D.Fla. 2010)
- *GFSL, Inc. v. Comfort Knitweaves(PVT), Ltd.*, 726 F.Supp.2d 1298, 2010 WL 2990188 (D.Kan. July 29, 2010)
- *In re Broward Kitchens & Baths, Inc.*, 429 B.R. 350 (S.D.Fla. Bankr. 2010)
- *In re The Deli Den, LLC*, 425 B.R. 725 (Bankr. S.D. Fla. 2010)
- *AVVA-BC, LLC v. Ameil*, 25 So.3d 7 (Fla. 3d DCA 2009)
- *Cantiere Nautico Cranchi, S.p.A. v. Luxury Marine Grp., LLC*, No. 09-60883-CIV, 2009 U.S. Dist. LEXIS 105590 (S.D. Fla. Oct. 27, 2009)
- *Design Bureau Corp. v. Colvin*, No. 08-22455-CIV-HOEVELER, 2009 U.S. Dist. LEXIS 81237 (S.D. Fla. Aug. 19, 2009)
- *Kapila v. Law Offices of Kanner & Pinaluga, P.A. (In re CBS Mktg. & Consulting Grp., LLC)*, Nos. 08-10765-JKO, 08-01529-JKO, 2009 Bankr. LEXIS 1055 (Bankr. S.D. Fla. Apr. 24, 2009)
- *In re Levinstein*, 2009 WL 412992 (S.D.Fla. Bankr. 2009)
- *Boudle v. CMI Network, Inc.*, No. 07-CV-2820, 2009 U.S. Dist. LEXIS 5606 (E.D.N.Y. Jan. 27, 2009)
- *Stockwire Research Group, Inc., et. al. v. Lebed, et. al.*, 577 F.Supp.2d 1262 (S.D. Fla. 2008)
- *Casa Del Rio, LLC v. LZG Realty, LLC*, 959 So. 2d 736 (Fla. 3d DCA 2007)
- *In re Sparrow*, 2007 WL 1482005, (Bkrtcy. S.D. Fla., Apr. 4, 2007)
- *In re Casa Del Rio, LLC*, 2007 WL 707035, (Bkrtcy. S.D.Fla. Mar. 7, 2007)
- *In re Toppin*, 342 B.R. 888 (Bankr. S.D. Fla. 2006)
- *Lexington Lasercomb I.P.A.G. v. Unger*, 234 F.R.D. 701 (S.D.Fla. 2006)
- *Obermaier v. Kenneth Copeland Evangelistic Association, Inc.*, 208 F.Supp.2d 1288 (M.D. Fla. 2002)
- *Obermaier v. Arnett, et al.*, 2002 WL 3165453 (M.D. Fla. Nov. 22, 2002)
- *Holbrook v. Nationwide Mutual Insurance Company*, 1999 WL 737956 (S.D. Fla. April 12, 1999)

Publications, Speeches, & Interviews

- **Author, International Law Quarterly, Summer 2024**, *Consignor's Blues - The Dark Paradigm of Unknown*
- **Author, Miami Dade Bar, September 2023 Bulletin**, *A Derivative Lawsuit Is Filed - A Special Litigation Committee May Need to be Appointed*

- **Author, Florida Bar Journal, May/June 2022, No Written Shareholder Agreement? A Survey of Florida Shareholders' Statutory Rights**
- **Presenter**, Legal Research and Writing Final Class, St. Thomas University School of Law, Miami, Florida - 2014-2019
- **Attorney at Law Magazine, Attorney of the Month**
- **Panelist Speaker and Moderator**, Circuit Court Boot Camp: A *Practical Trial Litigation Skills Program*, Pincus Professional Education, June 2014
- **Panelist Speaker and Moderator**, *Depos: Mastering the Deposition: A Critical Skills Workshop*, Pincus Professional Education, March 2014
- **Panelist Speaker and Moderator**, *Circuit Court Boot Camp: A Practical Trial Litigation Skills Program*, Pincus Professional Education, May 2013
- **Panelist Speaker and Moderator**, *Depos: Mastering the Deposition: A Critical Skills Workshop*, Pincus Professional Education, November 2012
- Pacenti, John, **Litigation: Landlord sues tenant, loses more in legal fees.** (Daily Business Review Jul. 7, 2010)
- Samuels, Michael, **Clawback Process Begins at Agape** (Long Island Business News, August 28, 2009)
- Pacenti, John, **Justice Watch: A Double Whammy for Those Swindled in Ponzi Cases.** (Daily Business Review Aug. 17, 2009)
- **Contributing Author**, Computer Consultant Malpractice, Information Technology Litigation, Practising Law Institute 2001, 2002
- **Contributing Author**, Juris '98 and Juris '99 (ERISA Section): District Court judicial clerks' manual for the Southern District of Florida

Designations

- Supreme Court of Florida, Qualified Arbitrator
- Florida Lemon Law Auto-line Arbitrator, Better Business Bureaus
- Mediator, by private party appointment
- Florida Notary Public

Honors

- Best Litigation Department, for Small Firms in the Categories of Real Estate and Other Litigation, Daily Business Review, Team Leader (2018)
- "Florida Super Lawyers," Thomson Reuters (2011 - 2024)
- Corporate America Legal Elite (2015)

Previous Experience

Weil, Gotshal & Manges LLP
Adorno & Zeder, P.A

Languages

- English
- French

Education

J.D., University of Miami School of Law, 1993
Cum Laude
University of Miami Law Review
University of Miami Moot Court Board
Finalist - Moot Court Competition
Litigation Skills - Trial Section (High "A")
Book Award - Florida Constitutional Law
B.S., Arizona State University, 1993
Business Management

Bar Admissions

State of New York

State of Florida

U.S. Court of Appeals, 11th Circuit

U.S. District Court Southern District of Florida

U.S. Bankruptcy Court Southern District of Florida

U.S. District Court Middle District of Florida

U.S. Bankruptcy Court Middle District of Florida

U.S. District Court Northern District of Florida

U.S. Bankruptcy Court Northern District of Florida

U.S. District Court Southern District of New York

U.S. Bankruptcy Court Southern District of New York

U.S. District Court Eastern District of New York

U.S. Bankruptcy Court Eastern District of New York

U.S. Western District of Oklahoma

Memberships and Affiliations

New York State Bar Association

Intellectual Property Section

Florida Bar

Business Law Section Grievance Committee - Section 17C. Chairman. Member

2008-2011

University of Miami Law School Alumni

Board Member, 2017 - Present

Arizona State University, South Florida Alumni

Board Member, 2016 - Present

Hillel of Broward and Palm Beach

Board Member, 2019 - Present

Broward County Bar Association

Intellectual Property Section

Jewish National Fund

Member Since: 2013 Board Member

B'nai Brith Justice Unit #5207

Member Since: 2007 Board Member



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Practice Areas

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Eric N. Assouline | Fort Lauderdale Business Litigation Lawyers

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Exhibit D: Peter A. Koziol, C.V.

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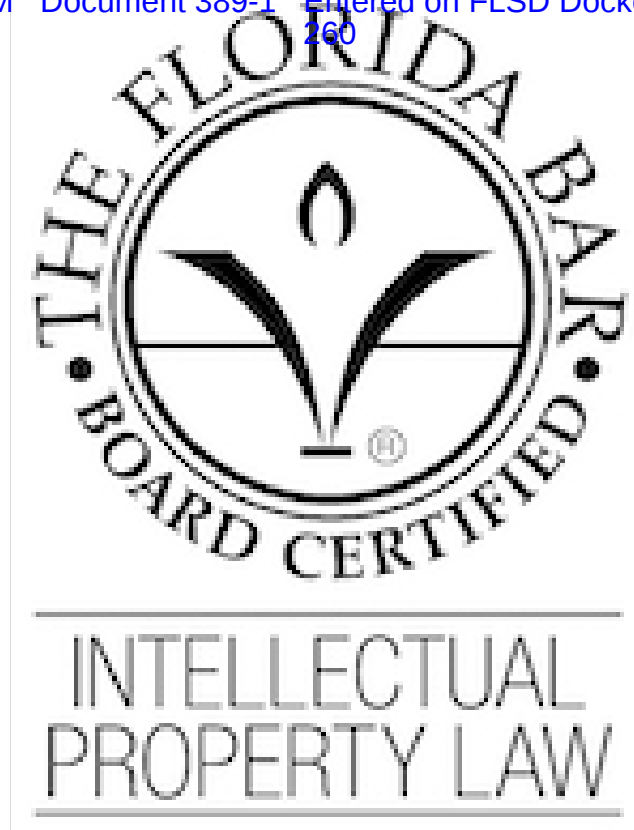


Peter A. Koziol is a partner in the Boca Raton Office and heads the firm's Intellectual Property Practice. He is also a member of the **Intellectual Property Practice**, **International Business Practice**, and **Litigation and Dispute Resolution Practice**. A Registered Patent Attorney and a **Florida Board Certified Expert in Intellectual Property Law**. Mr. Koziol focuses his practice on Clients with intellectual property portfolios, major claims, and high stakes intellectual property litigation.

Mr. Koziol represents influencers, individual entrepreneurs, private companies and public companies. His clients and their intellectual property have been featured in and on Today™, Shark Tank™, Oprah™'s favorite things, E!™, NYC Fashion Week™, American Idol™, Vogue™, Extra™, MTV™, FORTUNE™, FORBES™, CNN™, FOX™, WSJ™ and other mainstream and specialty media outlets. Corporate clients have included private equity, investment, and alternative investment management companies; hedge funds including fund of funds; real estate and cash management firms; multinational corporations.

Mr. Koziol has a substantial technical and business background. He is an accomplished software engineer, software developer, business and quality assurance analyst, and consultant. As an experienced computer programmer, he understands data structures, algorithms, software design methodologies, and has fluency in a variety of computer languages. Mr. Koziol directed domestic and international software development teams. He developed risk management and analysis software for private financial investment companies utilizing various proprietary hedging techniques and real time and predictive analysis of market data. And, he contributed to hundreds of major internationally published software titles, including multimillion dollar sellers and SIIA Codie Award winners.

Mr. Koziol is experienced representing pioneers and large companies in network communications disputes including patent litigation involving IEEE and various other industry standards such as TCP/IP, 802.11, SMS, MMS messaging systems and



GSM/CDMA protocols. He has also been involved in multiple projects involving swarming technologies, artificial intelligence, pattern recognition, and unmanned vehicles including unmanned aerial vehicles (UAVs). Mr. Koziol is very interested and enthusiastic about emerging drone technologies and related artificial intelligence.

Mr. Koziol represents business clients in a full-range of intellectual property matters. Of particular interest are: amusement inventions; computer software inventions; aerospace inventions; green energy inventions; new foods and drugs; international business organizations; domestic and offshore special purpose entities; and structured products.

Education

J.D., Case Western Reserve University, Cleveland, Ohio

- Honors: Law Technology and the Arts Concentration
- Law and the Arts Stream Recipient
- Center for Computer-Assisted Legal
- Instruction (CALI) Award for Copyright Litigation Recipient
- CALI Excellence for the Future Award for Law and the Visual Arts

B.A., State University of New York at Albany, Albany, New York
Computer Science

Bar Admissions

Florida
 U.S. Patent & Trademark Office, Registered Patent Attorney
 U.S. Court of Appeals for the Federal Circuit
 U.S. Court of Appeals for the Eleventh Circuit
 U.S. District Court Southern District of Florida
 U.S. District Court Middle District of Florida
 U.S. District Court Northern District of Florida
 U.S. District Court Eastern District of Wisconsin

Memberships and Affiliations

American Bar Association (ABA)
 American Intellectual Property Law Association (AIPLA)
 ΦΔΦ - Phi Delta Phi International Ethics and Legal Honors Fraternity (PDP)
 International Barristers' Society
 Institute of Electrical and Electronics Engineers (IEEE)
 Structured Products Association (SPA)

Notable Reported Cases & Pro Hac Vice Representation

NOTABLE CASES

- ElcomSoft, Ltd. v. Passcovery Co., Ltd., --- F.Supp.2d ---, 2013 WL 3972517 (E.D.Va. July 31, 2013).
- Five for Entertainment S.A. v. Rodriguez, No. 11–24142–CIV, 2013 WL 3733430 (S.D. Fla. July 15, 2013)
- M2M Solutions LLC v. Simcom Wireless Solutions Co., Ltd., --- F.Supp.2d ---, 2013 WL 1296753 (D.Del. 2013)
- Medimport S.R.L. v. Cabreja, --- F.Supp.2d ---, 2013 WL 1003625 (S.D.Fla. 2013)
- Export Development Canada v. Xacore, Inc., Case No: 8:12-CV-1244-T-17EAJ, 2013 WL 57693, (M.D.Fla. Jan. 03, 2013)
- Medimport, S.R.L. v. Cabreja, Case NO. 12-22255-CIV, 2012 WL 3632580 (S.D.Fla. July 31, 2012)
- In re Barkley International Incorporated, 2011 WL 1775951 (T.T.A.B. 2011)
- APP Pharmaceuticals, LLC v. Ameridose, LLC, Civil Action No. 10–4109-JAP (D.N.J.) (patent litigation involving anesthetic drug known as ropivacaine.
- GFSI, Inc. v. Comfort Knitwears (PVT), Ltd., --- F.Supp.2d ---, 2010 WL 2990188 (D.Kan. July 29, 2010)
- AVVA-BC v. Amiel, --- So.3d ---, 2009 WL 3446475 (Fla. 3d DCA Oct. 28, 2009)
- Cantiere Nautico Cranchi, S.p.A. v. Luxury Marine Group, LLC, 2009 WL 3538722 (S.D. Fla. Oct. 28, 2009).
- Design Bureau Corp. v. Colvin, 2009 WL 2576372, (S.D. Fla. Aug. 19, 2009)
- Stockwire Research Group, Inc., et. al. v. Lebed, et. al., 577 F. Supp. 2d 1262, 2008 WL 4279507 (S.D. Fla. Sept. 18, 2008)

PRO HAC VICE REPRESENTATION

Lead Trial Counsel,

- U.S. District Court, Central District of California
 - U.S. District Court, of Delaware
 - U.S. District Court of Kansas
 - U.S. District Court of New Jersey
 - U.S. District Court, Eastern District of Virginia
-

Publications, Interviews and Speeches

- **Intellectual Property for the Non-IP Attorney**, Pincus Professional Education Webinar (2015)
- Pacenti, John - Justice Watch: Software A New Frontier In IP Law (Daily Business Review, Sept. 2013)
- Mitch Strohm, "Patent Reform: Supporting Or Stifling U.S. Innovation?" (THELAW.TV June, 14 2013).
- Morley, Hugh R., " **Youngest person charged by SEC now in Wayne and in hot water again**," (North Jersey, The Record, Sunday, June 27, 2010).
- " **Protection of the Moral Rights of the Digital Graphic Artist**", co-author, Florida Bar Journal (2007), republished in 25 The Computer & Internet Lawyer 21 (2008).
- Florida Bar, Entertainment and Sports Law Section (EASL), 2008 Retreat Lecture Series, "How to Advise Your Clients in Your Practice of Law in the Digital Age Regarding Intellectual Property Rights Protection and Infringement in the New Digital Era."
- Blog: <http://www.koziollaw.com>



Practice Areas

Creditors Rights & Bankruptcy

Labor and Employment

Succession Planning

Business Litigation and Dispute Resolution

International Law and Arbitration

Intellectual Property

Corporate and Finance

Real Estate

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Peter A. Koziol B.C.S. | Boca Raton Intellectual Property Lawyers

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Exhibit E: Ellen M. Leibovitch C.V.

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Ellen M. Leibovitch
Partner

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Boca Raton, Florida 33431





Ms. Ellen Leibovitch, a Florida Board Certified Labor and Employment Attorney, is a partner in the Boca Raton office and she heads our Labor and Employment Law Practice. Ms. Leibovitch focuses her practice on labor and employment law counseling and litigation, as well as commercial and business litigation.

Ms. Leibovitch counsels and assists clients on the full-range of labor and employment matters. She drafts, analyzes, and evaluates employee handbooks; and she prepares employment, non-compete, confidentiality, severance, separation, independent contractor and other employment-related agreements. Ms. Leibovitch has made numerous employment-related presentations to clients and to business and other organizations including:

- developing and implementing policies and practices against harassment and discrimination
- effective use of employee handbooks and personnel policies
- implementing diversity programs
- enforcing and challenging enforcement of non-compete agreements
- investigating and remedying harassment and discrimination complaints
- how to navigate wage and hour, I-9, workers compensation and other audits by federal and state agencies
- navigating the Fair Labor Standards Act's statutory and regulatory requirements
- recognizing and preventing harassment in the work place
- records retention requirements and programs

Ms. Lebowitz has substantial and significant legal and public policy experience. She litigates cases in state and federal courts and represents clients at governmental agency proceedings. The types of matters she handles include the following:

- age, race, disability and gender discrimination
- Family & Medical Leave Act violations
- breach of partnership and other contractual issues
- claims against businesses under Title III of the Americans With Disabilities Act of 1990
- overtime under the Fair Labor Standards Act
- sexual and other forms of harassment
- non-compete, non-solicitation and other restrictive covenants
- theft of trade secrets

Education

J.D., University of Florida School of Law, 1986

B.A., University of Florida School of Law, 1983

Bar Admissions

Florida

U.S. District Court Southern District of Florida

U.S. District Court Middle District of Florida

U.S. District Court Northern District of Florida

Memberships and Affiliations

The Florida Bar

Labor and Employment Section

- Labor & Employment Law Certification Committee

Florida Association of Women Lawyers, South Palm Beach County Chapter

Board of Directors, Past President

Perennial chair of Past Presidents Committee/Woman Lawyer of the Year awards ceremony

South Palm Beach County Bar Association

President

Senior Care Strategies, Inc.

Board of Directors

Publications, Including the Following

- The Legalities & Practicalities of Telecommuting
- What to do When Terminating an Employee
- Make Sure You Are Not DOA When the DOL Comes Knocking
- Can Employers Require Employees to Get the COVID-19 Vaccine?
- Application of the Religious Exemption in the Era of Employer-Mandated Vaccinations
- Does non-payment of wages to an exempt employee give rise to an FLSA claim?
- Final Rule To Update FLSA's Joint Employer Regulations
- Exempt Employee Thresholds
- Significant Changes to Overtime Regulations
- Website ADA Compliance – The Next Wave of Litigation?

- Employers: New Tax Law Makes Confidential Sexual Harassment Settlements Not Deductible
- Protecting Employers from Sexual Harassment Claims
- Changes to the FLSA and Compensation to Live-In Domestic Care Workers
- Time to Review Employee Handbooks

Speeches, Including the Following

- **3 Chicks Chat: Episode #19 - Employment Contracts**
- What Employers Need to Know About COVID19
- Can Employers Require Employees Be Vaccinated?
- Do's and Don'ts for Email (and Other Electronic) Communications
- Employment Laws all Employers Should Know
- Amendments to the Fair Labor Standards Act's Overtime Requirements
- Year-end Celebrations and Related Work Place Issues
- Employers Beware: Do Not Fall Prey to Overtime Traps
- How to Distinguish Between Employees and Independent Contractors
- Hiring and Firing Persons with Disabilities
- Employee Handbooks and Record-keeping Requirements
- Ethics and Employment: What All Paralegals Should Know
- Smart Hiring Strategies for Interviews and Background Checks

Designations

- Board Certified by the Florida Bar: Labor & Employment law

Honors and Rankings

- Boca Raton Observer's Top Lawyers of 2023
- Americas Most Honored Lawyers, The American Registry (2022)
- Top Lawyers, Palm Beach County (2020-2021)
- "Top Attorneys in Florida," The Wall Street Journal
- "Top Attorneys in Florida," The American Registry
- "Florida Super Lawyers," Thomson Reuters (2010 - 2021)
- South Florida Leaders in the Law (2018)
- Palm Beach Illustrated, Top Lawyers
- Corporate America Legal Elite (2015)
- "Florida Attorney of the Year - Employment Law," Legal Elite (2015)
- "Attorney to Watch in 2015," Attorney at Law Magazine
- "Leader in the Law," Florida Association of Women Lawyers
- Outstanding Public Service Program - "Educating Tomorrow's Adults," Florida Association for Women Lawyers
- "Leaders in Law," Lifestyle Media Group



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Ellen M. Leibovitch | Boca Raton Employment Litigation Lawyers

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Exhibit F: Francisco J. Barreto C.V.

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Francisco Jorge Barreto ("Frank"), is an associate in our Fort Lauderdale office. His practice is focused on intellectual property consulting, intellectual property litigation, and commercial litigation.

Prior to joining the team at Assouline & Berlowe in May 2022, Mr. Barreto worked for three years at a prominent Florida based civil defense firm where he represented various individuals, corporations, and insurance companies before state and federal courts in a broad array of legal matters. His practice focused primarily on automobile negligence, product liability, premises liability, construction defect, and aviation law. He also consulted on various intellectual property and contract matters, with emphasis on trademark prosecution. Since joining Assouline & Berlowe, Mr. Barreto has used his prior litigation experience to zealously advocate on behalf of his clients, and he has continued to grow his intellectual property practice.

Mr. Barreto earned a Bachelor of Science from Florida State University in 2006, with a major in mechanical engineering and minors in both mathematics and physics. He later went on to earn his Juris Doctor cum laude at Nova Southeastern University, Shepard Broad College of Law, in 2019 and placed on the Dean's List for three consecutive years. While in law school, he served as an associate executive editor of *ILSA Journal of International and Comparative Law*, competed in the Earl E. Zehmer Mock Trial Competition in Orlando, FL in 2017, and earned the CALI Book Award for both UCC Sales and Trademark/Unfair Competition.

Prior to his career as an attorney, Mr. Barreto worked at a South Florida engineering firm assisting with mechanical, plumbing, and electrical design work for single family residences, multi-family residences, and commercial buildings. He also worked at a patent prosecution law firm assisting attorneys practicing before the United States Patent and Trademark Office, drafting legal documents, and supporting staff members.

Mr. Barreto is admitted to practice in the State of Florida and is a member of the Florida Bar and Nova Southeastern Trial Association. He is also admitted to practice before the United States District Court for the Southern District of Florida. In addition to his current bar admissions, Mr. Barreto is eligible to sit for the Patent Bar Exam, and he aspires to become a Registered Patent Attorney with the United States Patent and Trademark Office in the near future.

Mr. Barreto is fluent in Spanish and is dedicated to serving the diverse South Florida community. Outside of practicing law, Mr. Barreto enjoys fishing, free diving, sports, and spending time with his friends and family.

Education

J.D., Nova Southeastern University, Shepard Broad College of Law, 2019
cum laude

B.S., Florida State University, 2016

Jurisdictions Admitted to Practice

State of Florida

Professional & Bar Association Memberships

Florida Bar



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Practice Areas

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Succession Planning

Business Litigation and Dispute Resolution

International Law and Arbitration

Intellectual Property

Corporate and Finance

Real Estate

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Francisco Barreto | Dania Commercial Litigation Lawyers Assouline & Berlowe

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Exhibit G: Daniel B. McCain C.V.

Daniel B. McCain



Work Experience

Gangemi Law Group, PLLC
Apr 2024 – Aug 2025

Assouline & Berlowe, P.A.
Jul 2023 - Apr 2024 ·

Cole, Scott & Kissane, P.A. ·
May 2023 - Jul 2023 ·

Stearns Weaver Miller
Apr 2021 - Feb 2023 ·

The McCain Law Firm, PLLC
Apr. 2020 - Apr 2021

Education

Northwestern University Pritzker School of Law
Master of Laws - LLM (candidate)
Aug 2024 - May 2025

Elon University School of Law
Doctor of Law (J.D.)
2016 – 2018

Florida Bar Member April 17, 2020

Exhibit H: Veronique Malebranche C.V.



Veronique Malebranche

Veronique Malebranche is a graduate of Florida International University where she earned a bachelor's degree in International Business, followed by a Juris Doctor from St. Thomas University College of Law.

While in law school, Ms. Malebranche served as a Student Attorney with the Public Interest Law Society to receive a favorable decision on behalf of her client at the San Antonio Immigration Court. She was also a member of the Moot Court Team and argued at the U.S. District Court in Atlanta, Georgia as part of a Moot Court competition.

Ms. Malebranche is a recipient of the Top 20 Under 40 Young Professional Award, a graduate of the Florida Bar Leadership Academy, a member of the Board of Governors of the Florida Bar Young Lawyers Division on behalf of the 11th Judicial Circuit, and the President of the Haitian Lawyers Association. Ms. Malebranche is fluent in French and Haitian Creole, and intermediate in Spanish.

Ms. Malebranche is a member of the Florida Bar Since 2017.

Exhibit I: Andres J. Caldera C.V.

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Associate

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Fax: (305) 567-9343

100 SE 2nd St., Suite 3650

Miami, Florida 33131



Andres J. Caldera, a dual Nicaraguan-U.S. attorney, is an associate in the Miami office. His practice is focused on international litigation and transactions. With a robust background in both Civil and Common law systems, Mr. Caldera brings a unique perspective to his practice, allowing him to effectively advocate for clients on a global scale.

Mr. Caldera earned his Degree in Law from Universidad de Navarra School of Law in 2017, where he distinguished himself by participating in international arbitration moot court competitions. He began his legal career at a prominent Central American firm in Nicaragua, specializing in Banking and Finance. There, he advised foreign investors and financial institutions on Nicaragua's civil law system and administrative regulations.

In December 2021, Mr. Caldera graduated Cum Laude from the University of Miami School of Law, where he obtained his J.D. and LL.M. in International Law. During his time at Miami Law, Mr. Caldera excelled in various roles, including achieving second place in a foreign direct investment arbitration moot court competition, serving as Research Assistant for his Legal Research and Communications professor, serving as a Dean's Fellow for the Introduction to U.S. Law course, and earning recognition with a CALI Excellence for the Future Award in Administrative Law.

Before joining Assoulina & Berlowe, Mr. Caldera worked for two years at a Florida civil defense firm where he primarily represented insurers in complex insurance coverage litigation, bad faith litigation, and claims handling practices. This experience equipped him with a deep understanding of insurance law and litigation strategies.

Mr. Caldera's comprehensive understanding of both Civil and Common law systems, combined with his transactional and litigation experience, allows him to provide strategic and informed counsel to his clients. He approaches each case with a

comparable perspective, ensuring thorough and effective representation aligned with the unique complexities of cross-border disputes and transactions.

Education

Universidad de Navarra, Bachelor of Law, 2017

University of Miami School of Law, LL.M. in International Law, 2021

Cum laude

University of Miami School of Law, J.D., 2021

Cum laude

Jurisdictions Admitted to Practice

State of Florida

United States District Court for the Southern District of Florida

The Republic of Nicaragua

Professional & Bar Association Memberships

Florida Bar



Practice Areas

Creditors Rights & Bankruptcy

Labor and Employment

Succession Planning

Business Litigation and Dispute Resolution

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Andres J. Caldera | Florida Litigation Lawyers Assouline & Berlowe

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Exhibit J: Attorneys' Fee Time Entries

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
5/5/2025	Work on Response to McNae's Motion to Alter or Amend Judgment or for Relief Under Rules 59 and 60. (5.9)	5.9	500	\$2,950.00	Meredith J. Gussin	0	5.9	0	0	0	0	0	0	0
5/5/2025	Reviewing clerk filings and Judge Martinez's Orders striking same. (0.15) Drafting and revising response to McNae's Motion to Alter or Amend Judgment or for Relief Under Rules 59 and 60. (3.4) Legal research in support thereof. 0.6 Multiple zoom conferences with Meredith Gussin regarding same. (1.25)	5.4	550	\$2,970.00	Peter E Berlowe	5.4	0	0	0	0	0	0	0	0
5/2/2025	Review Ronda McNae's supplement to her Rule 60(b) motion to alter or amend judgment regarding allegations of misconduct by Richard Gomez. (1.2)	1.2	500	\$600.00	Meredith J. Gussin	0	1.2	0	0	0	0	0	0	0
5/2/2025	Review Ronda McNae's supplement to her Rule 60(b) motion to alter or amend judgment regarding allegations of misconduct by Richard Gomez. (2.7) Multiple zoom conferences with Meredith Gussin regarding same. (1.0)	3.7	550	\$2,035.00	Peter E Berlowe	3.7	0	0	0	0	0	0	0	0
5/1/2025	Review correspondence regarding enforcement of final judgment and post-judgment motions with the court. (1.0)	1	500	\$500.00	Meredith J. Gussin	0	1	0	0	0	0	0	0	0
5/1/2025	Review Order amending final judgment. (0.1) Multiple conferences with Meredith regarding same and affect on pending motions. (0.3) Emails regarding enforcement of final judgment and post-judgment motions. Review emails from Ronda McNae to Judge Martinez. (0.15) Call with Meredith Gussin regarding same. (0.1) Emails with case team on recording judgment in Washington State. (0.25) Extensive email exchanges with Ronda McNae regarding the fact information sheet and here apparent willing intent to not respond to required portions of same and research on contempt remedies for such willful failure to abide by the Court's order. (0.75) Emails with Mike Fitzgerald regarding Ronda McNae's apparent intent to evade judgment collection by any means, including unlawful means. (0.25)	1.8	550	\$990.00	Peter E Berlowe	1.8	0	0	0	0	0	0	0	0
4/30/2025	Work with Meredith Gussin on sending proposed amended final judgment to Judge's chambers. (0.2) Review emails from Ronda McNae to Court requesting judge rule on her motion before our motion. (0.15)	0.35	550	\$192.50	Peter E Berlowe	0.35	0	0	0	0	0	0	0	0
4/29/2025	Review Ronda McNae's Response in Opposition to Fitzgerald's Motion to Alter or Amend Judgment. (0.3) Draft Reply to same and file with court. (0.8)	1.2	500	\$600.00	Meredith J. Gussin	0	1.2	0	0	0	0	0	0	0
4/29/2025	Review Ronda McNae's Response in Opposition to Fitzgerald's Motion to Alter or Amend Judgment. (0.35) Review and revise Meredith Gussin's Reply Brief to same. (0.75) Conference with Meredith Gussin regarding same. (0.3)	1.4	550	\$770.00	Peter E Berlowe	1.4	0	0	0	0	0	0	0	0
4/28/2025	Research on the farcicality of Ronda McNae's criminal complaints. (0.8) Call with Michael Fitzgerald regarding the farcicality of Ronda McNae's criminal complaints. (0.25)Review Mrs. McNae's email to Judge Martinez regarding her motion to vacate the final judgment. (0.2)	1.25	550	\$687.50	Peter E Berlowe	1.25	0	0	0	0	0	0	0	0
4/25/2025	Review Ronda McNae's Motion to Alter or Amend Judgment. (0.6)	0.6	500	\$300.00	Meredith J. Gussin	0	0.6	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
4/25/2025	Review Ronda McNae's Motion to Alter or Amend final judgment and attachments thereto. (1.0) Conference with Meredith Gussin regarding same. (0.2) Research issues raised in the motion. (0.7) Email attorneys fees motion, declaration, and vendor invoices to Mrs. McNae. (0.3) Exchange correspondence with Mrs. McNae. (0.4) Review Meredith Gussin's filed motion to alter or amend final judgment. (0.4) Review email from Ronda McNae to Judgment. (0.2)	3.2	550	\$1,760.00	Peter E Berlowe	3.2		0	0	0	0	0	0	0
4/24/2025	Draft Motion to Alter/Amend Final Judgment. (0.8)	0.8	500	\$400.00	Meredith J. Gussin	0	0.8	0	0	0	0	0	0	0
4/24/2025	Review and revise Motion for Summary Judgment and Declaration of Michael Fitzgerald in support. (1.9) Multiple conferences with Meredith Gussin Regarding same. (0.5) Review motion to compel deposition of Mike Fitzgerald. Conference with Meredith Gussin regarding same.	2.7	550	\$1,485.00	Peter E Berlowe	2.7	0	0	0	0	0	0	0	0
4/24/2025	Conference with Meredith Gussin on motion for leave to amend final judgment. Review and revise same. (0.5) Drafting motion for fees and costs and declaration in support, along with collecting supporting costs documentation. (3.75)	4.25	550	\$2,337.50	Peter E Berlowe	4.25	0	0	0	0	0	0	0	0
4/23/2025	Continue drafting motion for attorneys' fees and costs, declaration in support thereof, and collecting documentation in support. (4.1) Emails with court reporters from trial regarding expense of the trial transcripts. (0.15)	4.25	550	\$2,337.50	Peter E Berlowe	4.25	0	0	0	0	0	0	0	0
4/22/2025	Working on partial motion for summary judgment with Meredith Gussin. (1.25)	1.25	550	\$687.50	Peter E Berlowe	1.25	0	0	0	0	0	0	0	0
4/22/2025	Drafting motion for attorneys' fees and costs, declaration in support thereof, and collecting documentation in support. (3.4) Emails from and to Ronda McNae regarding accusing us interfering with her relationship with her insurer her threats to report us criminally to various authorities and to the bar. (1.2)	4.6	550	\$2,530.00	Peter E Berlowe	4.6	0	0	0	0	0	0	0	0
4/21/2025	Drafting motion for attorneys' fees and costs, declaration in support thereof, and collecting documentation in support. (2.25)	2.25	550	\$1,237.50	Peter E Berlowe	2.25	0	0	0	0	0	0	0	0
4/21/2025	Drafting motion for attorneys' fees and costs, declaration in support thereof, and collecting documentation in support. (3.2)	3.2	550	\$1,760.00	Peter E Berlowe	3.2	0	0	0	0	0	0	0	0
4/18/2025	Drafting motion for fees and costs and declaration in support. (2.1) Marshalling fee and cost records for same. (3.0) Review final judgment for issues. (0.1) Emails with Meredith Gussin. (0.5)	5.7	550	\$3,135.00	Peter E Berlowe	5.7	0	0	0	0	0	0	0	0
4/17/2025	Drafting motion for fees and costs and declaration in support. (2.3) Marshalling fee and cost records for same. (2.4) Emails with Mike Fitzgerald. (0.3) Emails with Meredith Gussin. (0.3)	5.3	550	\$2,915.00	Peter E Berlowe	5.3	0	0	0	0	0	0	0	0
4/16/2025	Reviewing and revising proposed findings of fact and conclusions of law. (3.1) Finalizing findings of fact and conclusions of law with Meredith Gussin. (1.1) Preparing motion for attorneys fees and costs, (1.5) including gathering data in support thereof. Review Ronda McNae's proposed findings of fact and conclusions of law. (0.3) Emails to and from Mike Fitzgerald regarding case issues. (0.25)	6.25	550	\$3,437.50	Peter E Berlowe	6.25	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
4/16/2025	Finalize proposed findings of fact and conclusions of law; (2.1) review R. McNae's proposed findings and conclusions; (0.3) analysis of same. (0.2)	2.6	500	\$1,300.00	Meredith J. Gussin	0	2.6	0	0	0	0	0	0	0
4/15/2025	Finalize Proposed Findings of Fact and Conclusions of Law; (2.7) Draft Proposed Final Judgment. (1.1)	3.8	500	\$1,900.00	Meredith J. Gussin	0	3.8	0	0	0	0	0	0	0
4/15/2025	Reviewing and revising proposed findings of fact and conclusions of law. (2.2) Preparing proposed findings of fact and conclusions of law with Meredith Gussin. (2.2) Preparing motion for attorneys fees and costs, including gathering data in support thereof. (0.1) Emails to and from Mike Fitzgerald regarding case issues.	5.7	550	\$3,135.00	Peter E Berlowe	5.7	0	0	0	0	0	0	0	0
4/14/2025	Continue drafting Proposed Findings of Fact and Conclusions of Law; (5.1) review R. McNae's filings to the court. (0.3)	5.4	500	\$2,700.00	Meredith J. Gussin	0	5.4	0	0	0	0	0	0	0
4/14/2025	Reviewing and revising proposed findings of fact and conclusions of law. (1.6) Preparing proposed findings of fact and conclusions of law with Meredith Gussin. (3.1) Preparing motion for attorneys fees and costs, including gathering data in support thereof. (1.1) Emails to and from Mike Fitzgerald regarding case issues. (0.3)	6.1	550	\$3,355.00	Peter E Berlowe	6.1	0	0	0	0	0	0	0	0
4/11/2025	Begin drafting Proposed Findings of Fact and Conclusions of Law. (2.1)	2.1	500	\$1,050.00	Meredith J. Gussin	0	2.1	0	0	0	0	0	0	0
4/11/2025	Multiple conferences with Meredith Gussin regarding this week's trial and proposed findings of fact and conclusions of law. (4.6) Multiple calls with Mike Fitzgerald regarding aspects of trial and next steps in case. (1.2)	5.8	550	\$3,190.00	Peter E Berlowe	5.8	0	0	0	0	0	0	0	0
4/10/2025	Trial. (3.2)	3.2	500	\$1,600.00	Meredith J. Gussin	0	3.2	0	0	0	0	0	0	0
4/10/2025	Preparing for and attending day 2 of trial. Multiple conferences with Meredith Gussin and Michael Fitzgerald regarding trial issues. (5.9) Conference with Meredith Gussin regarding proposed findings of fact and conclusions of law. (1.4)	7.3	550	\$4,015.00	Peter E Berlowe	7.3	0	0	0	0	0	0	0	0
4/9/2025	Trial. (7.2)	7.2	500	\$3,600.00	Meredith J. Gussin	0	7.2	0	0	0	0	0	0	0
4/9/2025	Preparing for and attending first day of trial. Multiple conferences with Meredith Gussin and Michael Fitzgerald regarding trial issues. (7.9) Preparing for day two of trial. (1.35)	9.25	550	\$5,087.50	Peter E Berlowe	9.25	0	0	0	0	0	0	0	0
4/8/2025	Trial preparation. (6.8)	6.8	500	\$3,400.00	Meredith J. Gussin	0	6.8	0	0	0	0	0	0	0
4/8/2025	Preparing for trial, including reviewing case documents and witness testimony, and reviewing and revising direct and cross examinations of witnesses. (7.1)	7.1	550	\$3,905.00	Peter E Berlowe	7.1	0	0	0	0	0	0	0	0
4/7/2025	Work on Jessica Bergman testimony; (1.9) work on opening statement; (3.3) call with Sheri Fiske and Gino Capese to review expert testimony. (2.0)	7.2	500	\$3,600.00	Meredith J. Gussin	0	7.2	0	0	0	0	0	0	0
4/7/2025	Preparing for trial, including reviewing case documents and witness testimony, and reviewing and revising direct and cross examinations of witnesses. (7.3)	7.3	550	\$4,015.00	Peter E Berlowe	7.3	0	0	0	0	0	0	0	0
4/6/2025	Trial Preparation with Sheri Fiske. (2.4)	2.4	500	\$1,200.00	Meredith J. Gussin	0	2.4	0	0	0	0	0	0	0
4/6/2025	Preparing for trial, including reviewing case documents and witness testimony, and reviewing and revising direct and cross examinations of witnesses. (8.4)	8.4	550	\$4,620.00	Peter E Berlowe	8.4	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
4/5/2025	Preparing for trial, including reviewing case documents and witness testimony, and reviewing and revising direct and cross examinations of witnesses. (3.6) Meet with Michael Fitzgerald and practice his direct examination. (6.1)	9.7	550	\$5,335.00	Peter E Berlowe	9.7	0	0	0	0	0	0	0	0
4/4/2025	Trial preparation. (5.0)	5	500	\$2,500.00	Meredith J. Gussin	0	5	0	0	0	0	0	0	0
4/4/2025	Preparing for trial, including reviewing case documents and witness testimony, and reviewing and revising direct and cross examinations of witnesses. (6.5)	6.5	550	\$3,575.00	Peter E Berlowe	6.5	0	0	0	0	0	0	0	0
4/3/2025	Prepare for and attend calendar call; (2.0) Trial preparation. (4.3)	6.3	500	\$3,150.00	Meredith J. Gussin	0	6.3	0	0	0	0	0	0	0
4/3/2025	Preparing for trial, including reviewing case documents and witness testimony, and reviewing and revising direct and cross examinations of witnesses. (6.2)	6.2	550	\$3,410.00	Peter E Berlowe	6.2	0	0	0	0	0	0	0	0
4/2/2025	Trial Preparation (6.7)	6.7	500	\$3,350.00	Meredith J. Gussin	0	6.7	0	0	0	0	0	0	0
4/2/2025	Preparing for trial, including reviewing case documents and witness testimony, and reviewing and revising direct and cross examinations of witnesses. (5.9)	5.9	550	\$3,245.00	Peter E Berlowe	5.9	0	0	0	0	0	0	0	0
4/1/2025	Trial Preparation. (5.1)	5.1	500	\$2,550.00	Meredith J. Gussin	0	5.1	0	0	0	0	0	0	0
4/1/2025	Preparing for trial, including reviewing case documents and witness testimony, and reviewing and revising direct and cross examinations of witnesses. (6.25)	0	550	\$0.00	Peter E Berlowe	0	0	0	0	0	0	0	0	0
3/31/2025	Trial Preparation. (8.5)	8.5	500	\$4,250.00	Meredith J. Gussin	0	8.5	0	0	0	0	0	0	0
3/31/2025	Preparing exhibits for trial. (1.4) Zoom conferences with Meredith Gussin regarding trial preparation. (0.5) Preparing for Trial. (2.5) Emails with expert Fiske. (0.2) Emails with Michael Fitzgerald regarding case and trial issues. Emails with Nichelle Womble. (0.3) Conference call with Nichelle Womble and Meredith Gussin regarding jury instructions. (1.5) Call with Meredith Gussin regarding expert testimony and trial issues. (0.4)	6.8	550	\$3,740.00	Peter E Berlowe	6.8	0	0	0	0	0	0	0	0
3/30/2025	Work on trial preparation. (7.2)	7.2	500	\$3,600.00	Meredith J. Gussin	0	7.2	0	0	0	0	0	0	0
3/30/2025	Preparing for trial. (4.1) Working on jury instructions and pretrial stipulation with Meredith Gussin. (2.3) Preparing Mike Fitzgerald direct examination with Meredith Gussin. (1.7)	7.1	550	\$3,905.00	Peter E Berlowe	7.1	0	0	0	0	0	0	0	0
3/29/2025	Prepare for Direct Examination of M. Fitzgerald. (6.7)	6.7	500	\$3,350.00	Meredith J. Gussin	0	6.7	0	0	0	0	0	0	0
3/29/2025	Preparing for trial. (1.05) Working on jury instructions and pretrial stipulation with Meredith Gussin. (1.8) Emails with Sheri Fiske regarding trial. (0.2) Zoom conference with Mike Fitzgerald and Meredith Gussin. (0.8) Zoom conference with Jessica Bergman and Meredith Gussin regarding her trial testimony. (0.9) Preparing Mike Fitzgerald direct examination with Meredith Gussin. (1.5)	6.25	550	\$3,437.50	Peter E Berlowe	6.25	0	0	0	0	0	0	0	0
3/28/2025	Review various court orders on motion in limine, motion re confidentiality, motion for reconsideration. (1.4)	1.4	500	\$700.00	Meredith J. Gussin	0	1.4	0	0	0	0	0	0	0
3/28/2025	Preparing for trial and review case documents. (1.15) Preparing trial testimony outlines. (3.1)	4.25	550	\$2,337.50	Peter E Berlowe	4.25	0	0	0	0	0	0	0	0
3/27/2025	Trial preparation; (1.8) review Joint Pretrial Stipulation. (0.4)	2.2	500	\$1,100.00	Meredith J. Gussin	0	2.2	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
3/27/2025	Preparing for trial and review case documents. (2.5) Working with Meredith Gussin on revising joint pretrial statement and jury instructions. (1.2) Reviewing expert witness direct examination. (0.5)	4.2	550	\$2,310.00	Peter E Berlowe	4.2	0	0	0	0	0	0	0	0
3/26/2025	Review order denying emergency motion to reconsider withdrawal; (0.1) draft response to motion for reconsideration of summary judgment motion; (1.1) trial prep.; (3.3) edit pretrial stipulation and jury instructions. (0.8)	5.3	500	\$2,650.00	Meredith J. Gussin	0	5.3	0	0	0	0	0	0	0
3/26/2025	Trial prep; (2.4) meet with Sheri Fiske; (1.4) finalize response to motion for reconsideration; (0.5) revise exhibit list; (0.4) motion for electronic devices; records custodian affidavit; (0.5) call with PEB. (0.5)	6.1	500	\$3,050.00	Meredith J. Gussin	0	6.1	0	0	0	0	0	0	0
3/26/2025	Preparing for trial and review case documents. (2.5) Review Order denying emergency motion to reconsider withdrawal motion. (0.1) Conferences with Meredith Gussin on response to motion for reconsideration of Order granting partial motion for summary judgment as to liability. (0.3) Reviewing and revising joint pretrial statement onad jury instructions. (1.2) Conferences with Meredith Gussin regarding same. (0.5)	4.6	550	\$2,530.00	Peter E Berlowe	4.6	0	0	0	0	0	0	0	0
3/25/2025	Preparing for trial and review case documents. Zoom conference with Sheri Fiske and Meredith Gussin. (1.5) Review and revise response to motion for reconsideration, and confer with Meredith Gussin regarding same. (0.8) Conference with Meredith Gussin on trial exhibit list and drafting motion for to bring technology into the courtroom. (1.25) Reviewing records custodian affidavit. (0.2) Multiple calls with Meredith Gussin on trial preparation issues. (1.9)	5.65	550	\$3,107.50	Peter E Berlowe	5.65	0	0	0	0	0	0	0	0
3/24/2025	Review Defendant's Motion regarding Unauthorized Settlement Pressure; (4.0) Review Court Orders on Motion to Strike, Motion to Withdraw. (0.2)	4.2	500	\$2,100.00	Meredith J. Gussin	0	4.2	0	0	0	0	0	0	0
3/24/2025	Preparing for trial and reviewing case documents regarding same. (3.25) Reviewing and revising response to motion for reconsideration, and conference with Meredith Gussin regarding same. (1.4) Reviewing Ronda McNae's Motion regarding unauthorized settlement pressure. (0.5) Review Judge Martinez's orders on withdrawal of counsel and motion to strike. (0.1)	5.25	550	\$2,887.50	Peter E Berlowe	5.25	0	0	0	0	0	0	0	0
3/23/2025	Prepare response in opposition to Motion for Reconsideration. (4.4)	4.4	500	\$2,200.00	Meredith J. Gussin	0	4.4	0	0	0	0	0	0	0
3/21/2025	Review McNae's correspondence to the court; (0.3) review Womble Notice of Withdrawal; (0.1) t/c with Peter Berlowe; (2.0) review court orders. (0.2)	2.6	500	\$1,300.00	Meredith J. Gussin	0	2.6	0	0	0	0	0	0	0
3/21/2025	Review Ronda McNae's filing to Judge Martinez regarding Urgent Notice Regarding Motion Sent via Courier Service This Morning accusing ARAG and McNae's counsel of asserting undue influence to settle claim (1.0).	1	300	\$300.00	Andres J. Caldera	0	0	0	0	0	0	0	0	1

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
3/21/2025	Preparing for trial and reviewing case documents in support of same. (2.9) Review Ronda McNae's prose email to the court. (0.2) Call with Meredith Gussin regarding same. (0.5) Call with Nichelle Womble regarding same. (0.3) Call with Counsel to Will McNae regarding same. (0.2) Emails from counsel for ARAG regarding same. (0.2) Review Nichelle Womble's motion to withdraw. (0.1)	4.4	550	\$2,420.00	Peter E Berlowe	4.4	0	0	0	0	0	0	0	0
3/20/2025	Prepare Motion for Clarification; (2.9) correspondence with SoftwareONE; (0.2) discussion of ARAG issues, phone conference with Althea Bryan Farr and Keisha Hill; (0.5) conference with Sheri Fiske. (1.5)	5.1	500	\$2,550.00	Meredith J. Gussin	0	5.1	0	0	0	0	0	0	0
3/20/2025	Discussing possible settlement with various case counsel and ARAG. (0.7) Preparing for Trial. (2.6) Multiple conferences with Meredith Gussin on case and trial issues. (0.9)	4.2	550	\$2,310.00	Peter E Berlowe	4.2	0	0	0	0	0	0	0	0
3/19/2025	Review transcripts of Sheri Fiske at previous trials; (1.3) revise, edit and finalize Sheri Fiske direct examination outline; (2.6) phone conference with Nichelle Womble. (0.4)	4.3	500	\$2,150.00	Meredith J. Gussin	0	4.3	0	0	0	0	0	0	0
3/19/2025	Preparing for trial. (0.95) Review Sheri Fiske testimony from prior trials. (1.3) Drafting witness examinations. (2.1) Telephone conference with Nichelle Womble and Meredith Gussin. (0.4)	4.75	550	\$2,612.50	Peter E Berlowe	4.75	0	0	0	0	0	0	0	0
3/18/2025	Continue preparing direct examination of Sheri Fiske; (3.7) review deposition of Sheri Fiske, expert report, and all reports; (1.2) review Daubert Motion. (0.2) Review status of ARAG Bad faith lawsuit; 0.4 discussion with PEB re communication with ARAG regarding status of case; 0.4 review issues surrounding possible settlement discussion with ARAG. 0.2	6.4	500	\$3,200.00	Meredith J. Gussin	0	6.4	0	0	0	0	0	0	0
3/18/2025	Internal meeting with Peter Berlowe and Meredith Gussin regarding McNae's social media post about stay in Washington State bad faith litigation (0.3). Review docket of McNae's bad faith litigation against ARAG Insurance in Washington State (1). Review McNae's ARAG Ins. Policy (0.4). Research Washington State insurance bad faith law regarding procedural bad faith when there is no duty to defend, indemnify, or settle (1.4). Internal discussion with Peter Berlowe regarding content of letter to ARAG Insurance (0.3). Draft correspondence to ARAG regarding invitation to enter into settlement discussion (1.3). Research Washington State law to determine whether Michael Fitzgerald may be haled into Washington state for sending letter to ARAG's counsel in Ohio (0.3). Continue draft of correspondence (0.8). Send correspondence to ARAG's counsel regarding invitation to enter into settlement discussions (0.1).	5.1	300	\$1,530.00	Andres J. Caldera	0	0	0	0	0	0	0	0	5.1

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
3/18/2025	Continue preparing direct examinations of witnesses. (1.8) Reviewing case deposition testimony of various witnesses. (1.1) Reviewing Sheri Fiske's expert report. (0.5) Review status of ARAG Bad faith lawsuit and discuss with Meredith Gussin and Andres Caldara as to possible settlement involving ARAG. (1.2) Preparing for trial. (1.0)	5.75	550	\$3,162.50	Peter E Berlowe	5.75	0	0	0	0	0	0	0	0
3/17/2025	Prepare direct examination of M. Fitzgerald; (3.4) review Fiske expert report; (0.6) prepare direct examination outline for Sheri Fiske. (2.2)	6.2	500	\$3,100.00	Meredith J. Gussin	0	6.2	0	0	0	0	0	0	0
3/17/2025	Working with Meredith Gussin on drafting lines of questions for various witnesses. (2.9) Preparing for trial. (0.5) Reviewing case documents in support thereof. (1.7)	5.1	550	\$2,805.00	Peter E Berlowe	5.1	0	0	0	0	0	0	0	0
3/14/2025	Work with PEB on finalizing Joint pretrial stipulation, jury instructions, verdict form. (2.1)	2.1	500	\$1,050.00	Meredith J. Gussin	0	2.1	0	0	0	0	0	0	0
3/14/2025	Conference with Meredith Gussin to finalize draft of jury instructions, joint pretrial stipulation and verdict form. (2.1) Preparing for trial. (1.8)	3.9	550	\$2,145.00	Peter E Berlowe	3.9	0	0	0	0	0	0	0	0
3/13/2025	Trial preparation, (1.0) jury instructions. (3.6)	4.6	500	\$2,300.00	Meredith J. Gussin	0	4.6	0	0	0	0	0	0	0
3/13/2025	Conferences with Meredith Gussin regarding jury instructions. (0.8) Revising jury instructions and joint pretrial stipulations. (2.8) Preparing for trial. (0.9)	4.5	550	\$2,475.00	Peter E Berlowe	4.5	0	0	0	0	0	0	0	0
3/12/2025	Work on jury instructions, verdict form; (2.4) review order on motion in limine; (0.3) revise and edit jury instructions and joint pretrial stipulation; (1.4) general trial preparation. (1.1)	5.2	500	\$2,600.00	Meredith J. Gussin	0	5.2	0	0	0	0	0	0	0
3/12/2025	Drafting jury instructions, joint pretrial and verdict form with Meredith Gussin. (2.4) Review Judge Martinez's order on motion in limine. (0.3) Reviewing case documents in preparation trial and lines of questions for witnesses. (1.65)	4.35	550	\$2,392.50	Peter E Berlowe	4.35	0	0	0	0	0	0	0	0
3/11/2025	Work on jury instructions, (2.4) review Court order on Motion for Continuance; (0.1) trial prep. (0.5)	3.2	500	\$1,600.00	Meredith J. Gussin	0	3.2	0	0	0	0	0	0	0
3/11/2025	Reviewing case documents in preparation for trial. (1.3) Work with Meredith Gussin on Joint Pretrial Stipulation and jury instructions. (2.4) Review Judge Martinez's order denying continuance of trial. (0.1)	3.8	550	\$2,090.00	Peter E Berlowe	3.8	0	0	0	0	0	0	0	0
3/10/2025	Revise Joint Pretrial Stipulation; (1.4) Revise Jury Instructions; (1.1) correspondence with counsel for McNae. (0.2)	2.7	500	\$1,350.00	Meredith J. Gussin	0	2.7	0	0	0	0	0	0	0
3/10/2025	Work with Meredith Gussin on Joint Pretrial Stipulation, Jury Instructions. (1.4) Exchange correspondence with case team and counsel for Ronda McNae regarding various trial preparation and case issues. (0.5) Reviewing case documents in preparation for trial. (2.0)	3.9	550	\$2,145.00	Peter E Berlowe	3.9	0	0	0	0	0	0	0	0
3/7/2025	Preparing for Trial (2.25)	2.25	550	\$1,237.50	Peter E Berlowe	2.25	0	0	0	0	0	0	0	0
3/6/2025	Travel to Federal Courthouse to attend Status Conference; (0.3) attend status conference and discuss strategy issues with client and team. (0.9)	1.4	550	\$770.00	Eric N. Assouline	0	0	1.4	0	0	0	0	0	0
3/6/2025	Prepare for and attend hearing on case management/motion to dismiss; (3.9) confer with clients re same; (1.3) review court order; analysis of state court case in conjunction with same. (0.3)	5.6	500	\$2,800.00	Meredith J. Gussin	0	5.6	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
3/6/2025	Multiple conferences with Meredith Gussin regarding case management, motion to dismiss, and motion for summary judgment arguments.(2.3) Preparing for Trial. (2.75) Attend case management conference with Judge Martinez. (0.5) Meet with clients before and after case management conference. (1.2)	6.75	550	\$3,712.50	Peter E Berlowe	6.75	0	0	0	0	0	0	0	0
3/5/2025	Prepare for hearing on Defendant's Motion to Dismiss; (1.1) review response to same; (0.8) Prepare for hearing on MSJ; (1.2) review court order granting MSJ; (0.4) discussions and analysis re same. (0.7)	4.2	500	\$2,100.00	Meredith J. Gussin	0	4.2	0	0	0	0	0	0	0
3/5/2025	Preparing for case management, motion to dismiss, and motion for summary judgment arguments via conference with Meredith Gussin. (2.9) Preparing for Trial. (1.1)	4	550	\$2,200.00	Peter E Berlowe	4	0	0	0	0	0	0	0	0
3/4/2025	Prepare for case management conference; (1.4) review and prepare for hearing on Motion to Dismiss, (1.7) Motion for partial summary Judgment as to Liability.(2.2)	5.3	500	\$2,650.00	Meredith J. Gussin	0	5.3	0	0	0	0	0	0	0
3/4/2025	Preparing for case management conference with Meredith Gussin. (1.4) Prepare motion to dismiss key points with Meredith Gussin for emphasis at hearing. (1.2) Reviewing motion for partial summary Judgment as to liability in case it comes up at case management conference.(1.1) Preparing for Trial. (1.1)	4.8	550	\$2,640.00	Peter E Berlowe	4.8	0	0	0	0	0	0	0	0
3/3/2025	Prepare for hearing on Motion to Dismiss. (3.2)	3.2	500	\$1,600.00	Meredith J. Gussin	0	3.2	0	0	0	0	0	0	0
3/3/2025	Reviewing case documents for trial. (0.5) Preparing for motion to dismiss hearing with Meredith Gussin. (1.75)	2.25	550	\$1,237.50	Peter E Berlowe	2.25	0	0	0	0	0	0	0	0
2/28/2025	Prepare for hearing on case management order; (1.1) review Motion to Dismiss, Response, Reply and Surreply; (0.7) review all exhibits and attachments to same. (0.8)	2.6	500	\$1,300.00	Meredith J. Gussin	0	2.6	0	0	0	0	0	0	0
2/28/2025	Reviewing case documents and deposition transcripts in preparation for trial (1.4)	1.4	550	\$770.00	Peter E Berlowe	1.4	0	0	0	0	0	0	0	0
2/27/2025	Finish review of Mike deposition; (0.4)finish direct examination outline and review of relevant documents for same. (1.0)	1.4	500	\$700.00	Meredith J. Gussin	0	1.4	0	0	0	0	0	0	0
2/27/2025	Reviewing case documents and deposition transcripts in preparation for trial. (1.1)	1.1	550	\$605.00	Peter E Berlowe	1.1	0	0	0	0	0	0	0	0
2/26/2025	Continue working on direct examination of M. Fitzgerald; (2.1) review deposition and exhibits. (0.9)	3	500	\$1,500.00	Meredith J. Gussin	0	3	0	0	0	0	0	0	0
2/26/2025	Preparing for trial. (0.9) Telephone conference with Meredith Gussin regarding trial issues. (0.3)	1.2	550	\$660.00	Peter E Berlowe	1.2	0	0	0	0	0	0	0	0
2/25/2025	Trial preparation - prepare for direct examination of Mike Fitzgerald. (8.0)	8	500	\$4,000.00	Meredith J. Gussin	0	8	0	0	0	0	0	0	0
2/25/2025	Trial preparation. (1.5)	1.15	550	\$632.50	Peter E Berlowe	1.15	0	0	0	0	0	0	0	0
2/24/2025	Prepare direct examination outline of Michael Fitzgerald. (5.5)	5.5	500	\$2,750.00	Meredith J. Gussin	0	5.5	0	0	0	0	0	0	0
2/24/2025	Telephone conference with Meredith Gussin regarding Mike Fitzgerald's direct examination. (0.35) Preparing for trial. (0.9)	1.25	550	\$687.50	Peter E Berlowe	1.25	0	0	0	0	0	0	0	0
2/21/2025	Review court orders; (0.2) analysis of same; (0.6) P/C with PEB to discuss status of case. (0.2)	1	500	\$500.00	Meredith J. Gussin	0	1	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
2/21/2025	Review court orders received today and analyze them. (0.2) Telephone conference with Meredith Gussin regarding orders and case status. (0.2) Preparing for trial. (1.0)	1.4	550	\$770.00	Peter E Berlowe	1.4	0	0	0	0	0	0	0	0
2/20/2025	Review correspondence to chambers from W. McNae; (0.1) review and analysis of protective order and issues related thereto; (1.7) correspondence with counsel, client re same. (0.2)	2	500	\$1,000.00	Meredith J. Gussin	0	2	0	0	0	0	0	0	0
2/20/2025	Review email from Will McNae to Judge Martinez. (0.1) Review confidentiality order and issues related thereto. (0.2) Emails to Will McNae's counsel in the State Court case to see if she knows what Will McNae is doing in the Federal Case. (0.2) Reviewing case depositions for trial. (1.9)	2.4	550	\$1,320.00	Peter E Berlowe	2.4	0	0	0	0	0	0	0	0
2/19/2025	Reviewing depositions for trial. (1.1)	1.1	550	\$605.00	Peter E Berlowe	1.1	0	0	0	0	0	0	0	0
2/18/2025	Review court Order; (0.1) prepare Surreply for filing; (0.5) review docket and assess outstanding motions and 90 day notice deadlines; (0.2) analysis of issues to prepare for trial. (0.5)	1.3	500	\$650.00	Meredith J. Gussin	0	1.3	0	0	0	0	0	0	0
2/18/2025	Review Order from Judge Martinez. (0.1) Telephone conference with Meredith Gussin regarding filing Surreply, outstanding motions, and trial preparation. (0.3) Reviewing case documents for trial. (0.85)	1.25	550	\$687.50	Peter E Berlowe	1.25	0	0	0	0	0	0	0	0
2/13/2025	Prepare Response to Motion to Challenge Confidentiality Designations; (2.4) Response to Motion for Leave to Strike Motion to File Surreply; (1.8) Response to Motion for Leave to File Electronically; (0.8) revise and edit same and finalize for filing. (0.4)	5.4	500	\$2,700.00	Meredith J. Gussin	0	5.4	0	0	0	0	0	0	0
2/13/2025	Reviewing and revising (i) response to Motion to Challenge Confidentiality Designations, (ii) response to Motion for Leave to Strike Motion to File Surreply, and (iii) response to Motion for Leave to File Electronically. (0.9) Conference with Meredith Gussin regarding same. (0.35)	1.25	550	\$687.50	Peter E Berlowe	1.25	0	0	0	0	0	0	0	0
2/10/2025	t/c with PEB to discuss pending motions; (0.3) review NOA from new counsel; (0.1) draft correspondence to same; (0.2) review Omnibus Order and assess pending motions. (0.5)	1.1	500	\$550.00	Meredith J. Gussin	0	1.1	0	0	0	0	0	0	0
2/10/2025	Telephone conference with Meredith Gussin regarding pending motions. (0.3) Review notice of appearance from new counsel and research her experience. (0.1) Call with Meredith Gussin regarding sending email to new attorney. (0.1) Review Omnibus Order from Judge Martinez and discuss with Meredith Gussin as to effect on other pending motions. (0.3) Preparing for trial. (1.45)	2.25	550	\$1,237.50	Peter E Berlowe	2.25	0	0	0	0	0	0	0	0
2/7/2025	Review R. McNae's three new motions - motion to challenge confidentiality, motion for e-filing privileges, motion to strike motion for leave to file surreply. (1.8)	1.8	500	\$900.00	Meredith J. Gussin	0	1.8	0	0	0	0	0	0	0
2/7/2025	Review Ronda McNae's motion to challenge confidentiality, motion for e-filing privileges, and motion to strike motion for leave to file surreply. (0.85)	0.85	550	\$467.50	Peter E Berlowe	0.85	0	0	0	0	0	0	0	0
2/5/2025	Reviewing case documents in support of trial preparation. (1.7)	1.7	550	\$935.00	Peter E Berlowe	1.7	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
2/4/2025	Correspondence with chambers regarding proposed order on Motion for Case Management Conference; (0.15) review emails from R. McNae re meet and confer. (0.25)	0.4	500	\$200.00	Meredith J. Gussin	0	0.4	0	0	0	0	0	0	0
2/4/2025	Review Meredith Gussin's email with chambers regarding proposed order on Motion for Case Management Conference. (0.1) Review email correspondence from Ronda McNae regarding meet and confer. (0.1) Reviewing case documents for trial. (0.9)	1.1	550	\$605.00	Peter E Berlowe	1.1	0	0	0	0	0	0	0	0
2/3/2025	T/C with PEB regarding recent response to case management motion and various meet and confer attempts with R. McNae; (0.7) correspondence with R. McNae re various pending issues; (0.3) review R. McNae's Response in opposition to Motion for Case Management Hearing; (0.3) Draft Reply in support of motion for case management; (1.6) draft proposed order re same. (0.3)	3.2	500	\$1,600.00	Meredith J. Gussin	0	3.2	0	0	0	0	0	0	0
2/3/2025	Telephone conference with Meredith Gussin regarding response to case management motion and attempts to meet and confer with Ronda McNae. (0.7) Emails between and among Meredith Gussin and Ronda McNae regarding open case issues. (0.3) Review Ronda McNae's Response in opposition to Motion for Case Management Hearing (0.25)	1.25	550	\$687.50	Peter E Berlowe	1.25	0	0	0	0	0	0	0	0
1/31/2025	Draft Motion for Leave to File Surreply; (1.85) correspondence with defendant about same. (0.25)	2.1	500	\$1,050.00	Meredith J. Gussin	0	2.1	0	0	0	0	0	0	0
1/31/2025	Multiple conferences with Meredith Gussin regarding filing Motion for Leave to File Surreply. (0.4) Review emails between Ronda McNae and Meredith Gussin regarding same. (0.2) Prepare for trial. (2.65)	3.25	550	\$1,787.50	Peter E Berlowe	3.25	0	0	0	0	0	0	0	0
1/30/2025	Review Reply in Support of Motion to Dismiss; (1.1) Review Exhibits to same and analysis of response to assert in surreply. (3.1)	4.2	500	\$2,100.00	Meredith J. Gussin	0	4.2	0	0	0	0	0	0	0
1/30/2025	Review Ronda McNae's Reply in Support of her Motion to Dismiss and attached exhibits.(2.1) Conference with Meredith Gussin regarding need to file motion for leave to file surreply. (0.7)	2.8	550	\$1,540.00	Peter E Berlowe	2.8	0	0	0	0	0	0	0	0
1/29/2025	Legal research regarding scheduling a hearing; (0.6) finalize motion and file same. (0.5)	1.1	500	\$550.00	Meredith J. Gussin	0	1.1	0	0	0	0	0	0	0
1/29/2025	Multiple conferences with Meredith Gussin on case status, issues and trial. (0.7) Review and revise motion for case management conference. (0.4) Prepare for trial. (2.2)	3.3	550	\$1,815.00	Peter E Berlowe	3.3	0	0	0	0	0	0	0	0
1/28/2025	Edit Motion for Hearing; (0.9) correspondence with R. McNae. (0.3)	1.2	500	\$600.00	Meredith J. Gussin	0	1.2	0	0	0	0	0	0	0
1/28/2025	Conference with Meredith Gussin Motion for Case Management Conference. (0.7) Emails with Meredith Gussin and Ronda McNae on case issues. (0.3)	1	550	\$550.00	Peter E Berlowe	1	0	0	0	0	0	0	0	0
1/27/2025	Reviewing case documents. (0.2) Preparing for trial. (0.1)	0.3	550	\$165.00	Peter E Berlowe	0.3	0	0	0	0	0	0	0	0
1/24/2025	Preparing for trial. (0.3) Reviewing case documents. (0.8)	1.1	550	\$605.00	Peter E Berlowe	1.1	0	0	0	0	0	0	0	0
1/23/2025	Reviewing case documents. (0.3) Preparing for trial. (0.3)	0.6	550	\$330.00	Peter E Berlowe	0.6	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
1/22/2025	Draft Motion to Schedule Case Management Conference; (2.1) Review Court orders on various pending motions; (0.3) file Surreply; (1.9) review court rules to filing document under seal. (0.3)	4.6	500	\$2,300.00	Meredith J. Gussin	0	4.6	0	0	0	0	0	0	0
1/22/2025	Conference with Meredith Gussin on Motion to Schedule Case Management Conference. (1.05) Review Court orders on several motions. (0.3) Conference with Meredith Gussin on Surreply. (0.4) Conference with Meredith Gussin on filing document under seal. (0.5)	2.25	550	\$1,237.50	Peter E Berlowe	2.25	0	0	0	0	0	0	0	0
1/21/2025	Review exhibits to McNae's Motion; (1.2) revise and edit to Response brief; (2.6)finalize and file same. (0.4)	4.2	500	\$2,100.00	Meredith J. Gussin	0	4.2	0	0	0	0	0	0	0
1/21/2025	Drafting additional sections to response to motion to dismiss. (2.6) Discuss the response with Meredith Gussin. (0.6)	3.2	550	\$1,760.00	Peter E Berlowe	3.2	0	0	0	0	0	0	0	0
1/20/2025	Revise and edit Response to Motion to Dismiss. (2.8)	2.8	500	\$1,400.00	Meredith J. Gussin	0	2.8	0	0	0	0	0	0	0
1/19/2025	Review Response to Motion to Dismiss. (1.5)	1.5	500	\$750.00	Meredith J. Gussin	0	1.5	0	0	0	0	0	0	0
1/17/2025	Reviewing case documents. (0.7) Preparing for trial. (0.3)	1	550	\$550.00	Peter E Berlowe	1	0	0	0	0	0	0	0	0
1/16/2025	Reviewing and revising response to motion to dismiss. (1.4) Conference with Meredith Gussin regarding same. (0.35)	1.75	550	\$962.50	Peter E Berlowe	1.75	0	0	0	0	0	0	0	0
1/15/2025	Reviewing case documents. (0.65) Preparing for trial. (0.1)	0.75	550	\$412.50	Peter E Berlowe	0.75	0	0	0	0	0	0	0	0
1/14/2025	Review McNae Motion to Dismiss and begin drafting response to same. (5.4)	5.4	500	\$2,700.00	Meredith J. Gussin	0	5.4	0	0	0	0	0	0	0
1/14/2025	Review Ronda McNae's Motion to Dismiss and discuss same with Meredith Gussin. (2.25)	2.25	550	\$1,237.50	Peter E Berlowe	2.25	0	0	0	0	0	0	0	0
1/13/2025	Review McNae Reply brief in support of emergency motion and address arguments set forth therein. (1.6)	1.6	500	\$800.00	Meredith J. Gussin	0	1.6	0	0	0	0	0	0	0
1/13/2025	Review Ronda McNae's Reply brief in support of her emergency motion. (0.8) Conference with Meredith Gussin regarding same. (0.45)	1.25	550	\$687.50	Peter E Berlowe	1.25	0	0	0	0	0	0	0	0
1/10/2025	Reviewing case documents. (0.5) Preparing for trial. (0.1)	0.6	550	\$330.00	Peter E Berlowe	0.6	0	0	0	0	0	0	0	0
1/9/2025	Preparing for trial. (0.1) Reviewing case documents. (0.4)	0.5	550	\$275.00	Peter E Berlowe	0.5	0	0	0	0	0	0	0	0
1/8/2025	Reviewing case documents. (0.3) Preparing for trial. (0.1)	0.4	550	\$220.00	Peter E Berlowe	0.4	0	0	0	0	0	0	0	0
1/7/2025	Finalize response to Emergency Motion and file same. (2.5)	2.5	500	\$1,250.00	Meredith J. Gussin	0	2.5	0	0	0	0	0	0	0
1/7/2025	Review and revise response to Emergency Motion. (1.7) Conference with Meredith Gussin regarding same. (0.4)	2.1	550	\$1,155.00	Peter E Berlowe	2.1	0	0	0	0	0	0	0	0
1/6/2025	Draft Response to McNae's Emergency Motion to Stay Pending Resolution of Critical Pre-Trial Issues and Irreparable Harm. (5.8)	5.8	500	\$2,900.00	Meredith J. Gussin	0	5.8	0	0	0	0	0	0	0
1/6/2025	Review of Emergency Motion and other Ronda McNae filings and work with Meredith Gussin on Responding to same. (3.9)	3.9	550	\$2,145.00	Peter E Berlowe	3.9	0	0	0	0	0	0	0	0
1/4/2025	Review of Emergency Motion and Various filings to prepare response to same. (3.6)	3.6	500	\$1,800.00	Meredith J. Gussin	0	3.6	0	0	0	0	0	0	0
1/3/2025	Review Court's Order and ruling to prepare expedited briefing on R. McNae's Emergency Motion. (0.3)	0.3	500	\$150.00	Meredith J. Gussin	0	0.3	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
1/3/2025	Review Order setting expedited briefing on Ronda McNae's Emergency Motion. (0.1) Discuss with Meredith Gussin. (0.2)	0.3	550	\$165.00	Peter E Berlowe	0.3	0	0	0	0	0	0	0	0
1/2/2025	Review R. McNae's Emergency Motion to Stay Proceedings Pending Resolution of Critical Pre-trial issues.; (0.8) assessment of response to same (0.7)	1.5	500	\$750.00	Meredith J. Gussin	0	1.5	0	0	0	0	0	0	0
1/2/2025	Review email correspondence between Meredith Gussin and Mrs. McNae. (0.2) Review emergency motion to stay proceedings. (0.7) Conference with Meredith Gussin regarding same. (0.35)	1.25	550	\$687.50	Peter E Berlowe	1.25	0	0	0	0	0	0	0	0
1/1/2025	Various correspondence with R. McNae regarding pretrial filings, various discovery disputes, pending motions. (0.5)	0.5	500	\$250.00	Meredith J. Gussin	0	0.5	0	0	0	0	0	0	0
12/31/2024	Emails with Meredith Gussin regarding pretrial stipulation and Ronda McNae not responding to our draft. (0.2) Preparing for trial. (0.5)	0.7	550	\$385.00	Peter E Berlowe	0.7	0	0	0	0	0	0	0	0
12/31/2024	Review correspondence regarding draft joint stipulation; (0.2) legal research regarding filing a unilateral stipulation; (.04) discuss same with PEB. (0.2)	0.8	500	\$400.00	Meredith J. Gussin	0	0.8	0	0	0	0	0	0	0
12/30/2024	Preparing for trial. (0.7) Emails with Meredith Gussin on case status and issues. (0.4)	1.1	550	\$605.00	Peter E Berlowe	1.1	0	0	0	0	0	0	0	0
12/27/2024	Review McNae's reply in support of Motion for Leave to Amend; (0.4) Review McNae's reply in support of motion for leave to file errata; (0.4) and McNae's reply in support of Motion to Correct Exhibit D. (0.4)	1.2	500	\$600.00	Meredith J. Gussin	0	1.2	0	0	0	0	0	0	0
12/24/2024	Reviewing trial exhibits. (1.4)	1.4	550	\$770.00	Peter E Berlowe	1.4	0	0	0	0	0	0	0	0
12/23/2024	Reviewing trial Exhibits and preparing for trial. (1.35)	1.35	550	\$742.50	Peter E Berlowe	1.35	0	0	0	0	0	0	0	0
12/20/2024	Reviewing exhibits on the exhibit list. (0.7) Reviewing expert reports regarding damages. (0.8) Preparing for trial. (0.6)	2.1	550	\$1,155.00	Peter E Berlowe	2.1	0	0	0	0	0	0	0	0
12/19/2024	Preparing for trial. (1.85)	1.85	550	\$1,017.50	Peter E Berlowe	1.85	0	0	0	0	0	0	0	0
12/18/2024	Draft reply in support of Motion for Leave to File Surreply; (1.4) Continue to work on Pretrial Stipulation, Exhibit List, Witness List, Jury Instructions. (4.4)	5.8	500	\$2,900.00	Meredith J. Gussin	0	5.8	0	0	0	0	0	0	0
12/18/2024	Working with Meredith Gussin on reply in support of Motion for Leave to File Surreply, draft Pretrial Stipulation, Exhibit List, Witness List, and Jury Instructions. (1.8) Preparing for trial. (2.3)	4.1	550	\$2,255.00	Peter E Berlowe	4.1	0	0	0	0	0	0	0	0
12/17/2024	Work on various response briefs; work on Joint Stipulation. (5.8)	5.8	500	\$2,900.00	Meredith J. Gussin	0	5.8	0	0	0	0	0	0	0
12/17/2024	Reviewing and revising response briefs. (0.6) Conference with Meredith Gussin regarding same.(0.4) Reviewing and revising portions of draft pretrial stipulation. (0.5) Preparing for trial. (2.75)	4.25	550	\$2,337.50	Peter E Berlowe	4.25	0	0	0	0	0	0	0	0
12/16/2024	Continue to work on Surreply; (1.2)draft and file Motion to File Document Under Seal; (0.7) Work on Jury Instructions. (4.5)	6.4	500	\$3,200.00	Meredith J. Gussin	0	6.4	0	0	0	0	0	0	0
12/16/2024	Conference with Meredith Gussin on changes to Surreply and preparing motion to file certain documents under seal. (0.5) Working with Meredith Gussin on Jury Instructions. (2.1) Preparing for trial. (1.8)	4.4	550	\$2,420.00	Peter E Berlowe	4.4	0	0	0	0	0	0	0	0
12/15/2024	Work on Exhibit List. (3.2)	3.2	500	\$1,600.00	Meredith J. Gussin	0	3.2	0	0	0	0	0	0	0
12/13/2024	Work on Exhibit List; (1.2) review all production; (2.2) draft Response to Motion to Correct; (0.4) revise and edit Surreply. (0.5)	4.3	500	\$2,150.00	Meredith J. Gussin	0	4.3	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
12/13/2024	Working with Meredith Gussin on Exhibit List for trial. (1.2) Reviewing and revising Response to Motion to Correct. (0.5) Conference with Meredith Gussin on issues for Surreply. (0.3) Review and revise same. (0.2) Preparing for trial. (1.0)	3.2	550	\$1,760.00	Peter E Berlowe	3.2	0	0	0	0	0	0	0	0
12/12/2024	Work on Joint Pretrial Stipulation including exhibit list; (2.1) review of production; (1.0) finalize draft of surreply. (1.7)	4.8	500	\$2,400.00	Meredith J. Gussin	0	4.8	0	0	0	0	0	0	0
12/12/2024	Conference with Meredith Gussin on Joint Pretrial Stipulation and exhibit list. (0.5) Reviewing and revising same. (0.3) Reviewing listed exhibits. (0.25) Conference with Meredith Gussin on surreply. (.05) Review and revise same. (0.2) Preparing for trial. (2.0)	3.75	550	\$2,062.50	Peter E Berlowe	3.75	0	0	0	0	0	0	0	0
12/11/2024	Review Ronda McNae Reply and prepare Surreply; various correspondence with McNae re same. (4.8)	4.8	500	\$2,400.00	Meredith J. Gussin	0	4.8	0	0	0	0	0	0	0
12/11/2024	Conference with Meredith Gussin regarding Ronda McNae's recent Reply brief and issues to raise by Surreply. (0.5) Emails between and among case team and Ronda McNae on case issues.(0.3) Prepare for trial. (1.6)	2.4	550	\$1,320.00	Peter E Berlowe	2.4	0	0	0	0	0	0	0	0
12/10/2024	Draft Pretrial Stipulation; (3.6) work on exhibit list; (0.5) review McNae's replies to various motions to supplement. (0.5)	4.6	500	\$2,300.00	Meredith J. Gussin	0	4.6	0	0	0	0	0	0	0
12/10/2024	Conferences with Meredith Gussin regarding pretrial stipulation, and exhibit list. (0.8) Review Ronda McNae's new replies to several motions to supplement. (0.5) Preparing for trial. (0.9)	2.2	550	\$1,210.00	Peter E Berlowe	2.2	0	0	0	0	0	0	0	0
12/9/2024	Preparing for trial. (0.5)	0.5	550	\$275.00	Peter E Berlowe	0.5	0	0	0	0	0	0	0	0
12/6/2024	Work on Joint Pretrial Stipulation. (1.6)	1.6	500	\$800.00	Meredith J. Gussin	0	1.6	0	0	0	0	0	0	0
12/6/2024	Conferences with Meredith Gussin regarding joint pretrial stipulation. (0.25) Preparing for trial. (1.1)	1.35	550	\$742.50	Peter E Berlowe	1.35	0	0	0	0	0	0	0	0
12/5/2024	Work on Joint Pretrial Stipulation. (1.8)	1.8	500	\$900.00	Meredith J. Gussin	0	1.8	0	0	0	0	0	0	0
12/5/2024	Conferences with Meredith Gussin regarding joint pretrial stipulation. (0.3) Preparing for trial. (0.8)	1.1	550	\$605.00	Peter E Berlowe	1.1	0	0	0	0	0	0	0	0
12/3/2024	Attend hearing on Motion to Withdraw; (1.2) review proposed order on motion to withdraw and extension of deadlines; (0.7) t/c with Richard Gomez. (0.3)	2.2	500	\$1,100.00	Meredith J. Gussin	0	2.2	0	0	0	0	0	0	0
12/3/2024	Conference with Meredith Gussin regarding hearing on Motion to Withdraw. (0.15) Review proposed order on motion to withdraw and extension of deadlines and discuss with Meredith Gussin. (0.35)	0.5	550	\$275.00	Peter E Berlowe	0.5	0	0	0	0	0	0	0	0
12/2/2024	Review McNae reply brief; (1.2) review status of docket and pending motions. (0.4)	1.6	500	\$800.00	Meredith J. Gussin	0	1.6	0	0	0	0	0	0	0
12/2/2024	Review Ronda McNae's most recent reply brief. (0.5) Discuss with Meredith Gussin. (0.25)	0.75	550	\$412.50	Peter E Berlowe	0.75	0	0	0	0	0	0	0	0
11/26/2024	Begin drafting Joint Pretrial Stipulation (1.4)	1.4	500	\$700.00	Meredith J. Gussin	0	1.4	0	0	0	0	0	0	0
11/25/2024	Review R. McNae's Motion for Extension and Court order re same. (0.3)	0.3	500	\$150.00	Meredith J. Gussin	0	0.3	0	0	0	0	0	0	0
11/22/2024	Finalize response to motion to supplement; (0.8) file same; (0.1) discuss with PEB. (0.2)	1.1	500	\$550.00	Meredith J. Gussin	0	1.1	0	0	0	0	0	0	0
11/22/2024	Review and revise response to motion to supplement. (1.3) and discuss same with Meredith Gussin. (0.2)	1.5	550	\$825.00	Peter E Berlowe	1.5	0	0	0	0	0	0	0	0
11/21/2024	Prepare Response in Opposition to McNae's latest Motion to Supplement the Record ECF No. 245. (4.2)	4.2	500	\$2,100.00	Meredith J. Gussin	0	4.2	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
11/21/2024	Working with Meredith Gussin on responding to Ronda McNae's latest Motion to Supplement the Record with 800+ pages of SoftwareOne v. Jane Doe records. (2.1)	2.1	550	\$1,155.00	Peter E Berlowe	2.1	0	0	0	0	0	0	0	0
11/20/2024	Review Ronda McNae's recent Motion to Supplement the Record with 800+ pages of documents; (2.0) review all exhibits and begin to formulate a response. (1.2)	3.2	500	\$1,600.00	Meredith J. Gussin	0	3.2	0	0	0	0	0	0	0
11/20/2024	Continue reviewing 800 plus pages of documents Ronda McNae wants to supplement the record with regarding SoftwareOne v. Jane Doe. (1.5) Conference with Meredith Gussin regarding responding to same. (1.2)	2.75	550	\$1,512.50	Peter E Berlowe	2.75	0	0	0	0	0	0	0	0
11/19/2024	Finalize and file response to Jim Hopper motion. (0.6)	0.6	500	\$300.00	Meredith J. Gussin	0	0.6	0	0	0	0	0	0	0
11/19/2024	Continue reviewing 800 plus pages of documents Ronda McNae wants to supplement the record with regarding SoftwareOne v. Jane Doe. (1.9)	1.9	550	\$1,045.00	Peter E Berlowe	1.9	0	0	0	0	0	0	0	0
11/18/2024	Review new motion to supplement from R. McNae; (0.5) call court; (0.2) finalize response to Jim Hopper motion; (2.4) review docket. (0.3)	3.4	500	\$1,700.00	Meredith J. Gussin	0	3.4	0	0	0	0	0	0	0
11/18/2024	Review yet another motion to supplement the Record received today from Ronda McNae. (0.5) Conference with Meredith Gussin regarding call clerk of Judge Martinez to see if we can get a status conference. (0.3) Call with Meredith Gussin on her call with the Clerk for Judge Martinez. (0.2) Work with Meredith Gussin on completing our response to Jim Hopper motion to supplement the record. (1.8)	1.8	550	\$990.00	Peter E Berlowe	1.8	0	0	0	0	0	0	0	0
11/15/2024	finalize response to Motion to Supplement re Jim Hopper. (0.7)	0.7	500	\$350.00	Meredith J. Gussin	0	0.7	0	0	0	0	0	0	0
11/15/2024	Review and revise response to Motion to Supplement the record with Jim Hopper deposition. (0.5) Conference with Meredith Gussin regarding same. (0.4)	0.9	550	\$495.00	Peter E Berlowe	0.9	0	0	0	0	0	0	0	0
11/14/2024	Prepare response brief in opposition to motion to supplement the record with the deposition of Dr. Jim Hopper. (5.0)	5	500	\$2,500.00	Meredith J. Gussin	0	5	0	0	0	0	0	0	0
11/14/2024	Multiple conferences with Meredith Gussin regarding issues for response brief in opposition to motion to supplement the record with the deposition of Jim Hopper. (1.35)	1.35	550	\$742.50	Peter E Berlowe	1.35	0	0	0	0	0	0	0	0
11/13/2024	Review Jim Hopper's deposition; (1.2)analysis of issues to raise in response to Motion to Supplement with Jim Hopper deposition. (0.9)	2.1	500	\$1,050.00	Meredith J. Gussin	0	2.1	0	0	0	0	0	0	0
11/13/2024	Mine Jim Hopper's deposition for useful testimony. (0.8) Work with Meredith Gussin on responding to motion to supplement the record regarding Jim Hopper deposition. (0.5)	1.3	550	\$715.00	Peter E Berlowe	1.3	0	0	0	0	0	0	0	0
11/12/2024	Review, edit and finalize reply briefs in support of motion in limine and motions to strike; (2.1) review motion to supplement with Jim Hopper documents; review Jim Hopper deposition. (0.9)	3.8	500	\$1,900.00	Meredith J. Gussin	0	3.8	0	0	0	0	0	0	0
11/12/2024	Review and revise our reply briefs in support of motion in limine and motions to strike. (1.0) Review Ronda McNae's motion to supplement the record with Jim Hopper documents. (0.4) Look in Jim Hopper deposition for favorable testimony that I recall should be helpful to the response to the motion. (0.5).	1.9	550	\$1,045.00	Peter E Berlowe	1.9	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
11/10/2024	revise and edit pending reply briefs. (1.7)	1.7	500	\$850.00	Meredith J. Gussin	0	1.7	0	0	0	0	0	0	0
11/7/2024	Review Motion in Limine; (0.4) Review McNae's response in opposition to same; (1.2) draft Reply brief; (1.8) legal research in support of same. (0.8)	4.2	500	\$2,100.00	Meredith J. Gussin	0	4.2	0	0	0	0	0	0	0
11/7/2024	Review Ronda McNae's response in opposition to motion in limine. (0.4) Work with Meredith Gussin on drafting Reply brief; (1.1) legal research in support of reply brief. (0.5)	2	550	\$1,100.00	Peter E Berlowe	2	0	0	0	0	0	0	0	0
11/6/2024	Review Cross Motion to Strike Jane Doe Documents; (0.3) Review McNae's Response in Opposition to Same; (0.4) draft Reply in support of Cross Motion to Strike; (5.1) review various correspondence from Ronda McNae; (0.25) draft correspondence to Magistrate requesting resolution of discovery issues. (0.35)	6.4	500	\$3,200.00	Meredith J. Gussin	0	6.4	0	0	0	0	0	0	0
11/6/2024	Review Ronda McNae's response to Cross Motion to Strike Jane Doe Documents. (.04) Conference with Meredith Gussin regarding same and outline issues to raise in Reply in support of Cross Motion to Strike. (1.0) Emails to and from Ronda McNae. Conference with Meredith Gussin regarding contacting Magistrate to resolve discovery issues. (0.25)	1.65	550	\$907.50	Peter E Berlowe	1.65	0	0	0	0	0	0	0	0
11/5/2024	Conference with Meredith Gussin regarding today's hearing on Motion to Strike Affirmative Defenses. (.35)	0.35	550	\$192.50	Peter E Berlowe	0.35	0	0	0	0	0	0	0	0
11/4/2024	Review Ronda McNae's Reply and Response in Opposition to Motion to Supplement the Record; (0.7) legal research regarding possible avenues to respond to same. (0.5)	1.2	500	\$600.00	Meredith J. Gussin	0	1.2	0	0	0	0	0	0	0
11/4/2024	Review Ronda McNae's Reply in Opposition to Motion to Supplement the Record. (0.4) Conference with Meridith Gussin regarding same and possible legal research in support of response. (0.4)	0.8	550	\$440.00	Peter E Berlowe	0.8	0	0	0	0	0	0	0	0
10/31/2024	Review McNae Reply in support of Motion to Supplement Record; (0.3) review exhibits to same; (0.4) legal research regarding rules on redacting confidential information; (0.3) review protective order. (0.4)	1.3	500	\$650.00	Meredith J. Gussin	0	1.3	0	0	0	0	0	0	0
10/25/2024	Emails with case team on case issues and strategy. (0.15)	0.15	550	\$82.50	Peter E Berlowe	0.15	0	0	0	0	0	0	0	0
10/24/2024	Revise and finale Response to Motion to Supplement; (1.1)revise and edit Declaration in response to Jane Doe Motion. (0.3)	1.4	500	\$700.00	Meredith J. Gussin	0	1.4	0	0	0	0	0	0	0
10/24/2024	Review and revise Response to Motion to Supplement. (0.9) Discuss same with Meredith Gussin. (0.25) Review and revise Declaration in response to Jane Doe Motion to Supplement the record. (0.7) Discuss same with Meredith Gussin. (0.25)	2.1	550	\$1,155.00	Peter E Berlowe	2.1	0	0	0	0	0	0	0	0
10/23/2024	Revise responses and motions to strike. (1.3)	1.3	500	\$650.00	Meredith J. Gussin	0	1.3	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
10/23/2024	Review emails regarding meet and confer from Ronda McNae regarding supplementing record with documentation from Jane Doe v. SoftwareONE. (0.2) Review emails between Meredith Gussin and Jenny Martinez. (0.1) Reviewing Reply in Support of Motion to Strike Daubert Reply. (0.2) Review emails between Meredith Gussin and counsel for SoftwareONE; (0.2) Analyze portions SoftwareONE's prior production. (2.0) Call with Meredith Gussin regarding same and her call with counsel for SoftwareONE and review of documents re same. (1.3) Review Ronda McNae's motion for extension of time. (0.3) Review Ronda McNae's additional motion to supplement the record with transcript of B. Weedman; (0.6) review B. Review relevant portions of Dr. Weedman's deposition. (0.9) Review and revise Response in Opposition to Ronda McNae's Motion to Supplement with Deposition of Sarah Dellinger. (1.1) Review and revise Response in Opposition to McNae's Motion to supplement with Deposition of Brock Weedman. (1.4)	8.3	550	\$4,565.00	Peter E Berlowe		8.3	0	0	0	0	0	0	0
10/22/2024	Review McNae's Motion to Supplement to add Jane Doe v. SoftwareONE file; (0.8) review all exhibits to same; (1.4) draft Response in Opposition to Motion to Supplement; (3.7) review various correspondence from Ronda McNae to chambers and meet and confer. (0.3)	6.2	500	\$3,100.00	Meredith J. Gussin		0	6.2	0	0	0	0	0	0
10/21/2024	Draft Response in Opposition to McNae's Motion to Supplement with Deposition of Sarah Dellinger; (1.0) Draft Response in Opposition to McNae's Motion to supplement with Deposition of Brock Weedman. (1.2)	2.2	500	\$1,100.00	Meredith J. Gussin		0	2.2	0	0	0	0	0	0
10/18/2024	Review docket re pending motions; review correspondence from R. McNae; (0.2) review R. McNae motion for extension of time with the Court; (0.2) review R. McNae's motion to supplement the record with transcript of B. Weedman; (0.7) review B. Weedman depo in part. (0.4)	1.8	500	\$900.00	Meredith J. Gussin		0	1.8	0	0	0	0	0	0
10/17/2024	Telephone conference with counsel for SoftwareONE and review of documents re same. (0.9)	0.9	500	\$450.00	Meredith J. Gussin		0	0.9	0	0	0	0	0	0
10/16/2024	Review docket; (0.2) prepare Motion to Compel Responses to Interrogatories; (0.6) prepare correspondence to counsel for W. McNae re same. (0.2)	1	500	\$500.00	Meredith J. Gussin		0	1	0	0	0	0	0	0
10/16/2024	Correspondence with counsel for SoftwareONE; (0.3) review SoftwareONE production. (1.5)	1.8	500	\$900.00	Meredith J. Gussin		0	1.8	0	0	0	0	0	0
10/11/2024	Prepare Reply in Support of Motion to Strike Daubert Reply; (0.5) legal research regarding same. (0.5)	2.4	500	\$1,200.00	Meredith J. Gussin		0	2.4	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
10/10/2024	Review correspondence re meet and confer from Ronda McNae regarding supplementing record with documentation from Jane Doe v. SoftwareONE; (1.8) correspond with Jenny Martinez re same. (0.3) Draft Reply in Support of Motion to Strike Daubert Reply. (0.2)	2.1	500	\$1,050.00	Meredith J. Gussin	0	2.1	0	0	0	0	0	0	0
10/9/2024	Review correspondence from R. McNae regarding supplementing record. (0.1)	0.3	500	\$150.00	Meredith J. Gussin	0	0.3	0	0	0	0	0	0	0
10/9/2024	Emails with Ronda McNae and Meredith Gussin regarding McNae wanting to "supplement the record." (0.3)	0.3	550	\$165.00	Peter E Berlowe	0.3	0	0	0	0	0	0	0	0
10/8/2024	Review Ronda McNae filing. (0.65) Review Order granting Ronda McNae's motion for extension of time. (0.1)	0.75	550	\$412.50	Peter E Berlowe	0.75	0	0	0	0	0	0	0	0
10/7/2024	T/c with PEB to strategize going forward; (0.5) review of McNae's recent motions, responses and replies. (0.8)	1.3	500	\$650.00	Meredith J. Gussin	0	1.3	0	0	0	0	0	0	0
10/7/2024	Telephone conference with Meredith Gussin regarding case strategy. (0.5) Review Ronda McNae's recent issues she has raised now that she is pro se. (0.3) Review motion for leave to supplement record with Sarah Delinger related documentation and deposition. (0.6)	1.4	550	\$770.00	Peter E Berlowe	1.4	0	0	0	0	0	0	0	0
10/4/2024	review McNae's reply to Motion to Strike. (0.8)	0.8	500	\$400.00	Meredith J. Gussin	0	0.8	0	0	0	0	0	0	0
10/4/2024	Review Ronda McNae's reply to our Motion to Strike. (0.5) Discuss same with Meredith Gussin. (0.5) Review Ronda McNae Motion for Extension of Time. (0.25)	1.25	550	\$687.50	Peter E Berlowe	1.25	0	0	0	0	0	0	0	0
10/3/2024	Review McNae's Reply in Support of Daubert Motion; (0.4) review Jane Doe v. SoftwareONE matter; (0.3) prepare Motion to Strike and file same. (0.7)	1.4	500	\$700.00	Meredith J. Gussin	0	1.4	0	0	0	0	0	0	0
10/3/2024	Review Ronda McNae's Reply in Support of Daubert Motion; (0.4) review Jane Doe v. SoftwareONE case docket and filings. (0.3) Discuss same with Meredith Gussin. (0.3) Work with Meredith Gussin on drafting Motion to Strike. (0.4) Email to Mike Fitzgerald regarding Ronda McNae claiming Mike knew about a "Jane Doe" suit and did not disclose in discovery. (0.1) Emails with Meredith Gussin regarding Sarah Dellinger deposition transcript. (0.1)	1.6	550	\$880.00	Peter E Berlowe	1.6	0	0	0	0	0	0	0	0
10/2/2024	Review Order permitting Ronda McNae's attorney to withdraw from case. (0.1) Review Order continuing trial. (0.1) Call with Meredith Gussin regarding case issues and strategy. (0.7)	0.9	550	\$495.00	Peter E Berlowe	0.9	0	0	0	0	0	0	0	0
10/1/2024	Work with Meredith Gussin on joint motion for extension of trial dates. (0.25)	0.25	550	\$137.50	Peter E Berlowe	0.25	0	0	0	0	0	0	0	0
9/30/2024	Draft Motion for Extension of Time; begin to assess Joint Pre trial Stipulation. (1.2)	1.6	500	\$800.00	Meredith J. Gussin	0	1.6	0	0	0	0	0	0	0
9/30/2024	Conference with Meredith Gussin on case issues and status. (0.15)	0.15	550	\$82.50	Peter E Berlowe	0.15	0	0	0	0	0	0	0	0
9/27/2024	Review status of pending dealines and assess Gomez's withdrawal re potential continuance of dates. (1.1)	1.1	500	\$550.00	Meredith J. Gussin	0	1.1	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
9/27/2024	Conference with Meredith Gussin on case issues and status. (0.2)	0.2	550	\$110.00	Peter E Berlowe	0.2	0	0	0	0	0	0	0	0
9/26/2024	Finalize response to Motion in Limine, compile exhibits, and file same. (1.9)	1.9	500	\$950.00	Meredith J. Gussin	0	1.9	0	0	0	0	0	0	0
9/26/2024	Work with Meredith Gussin on motion in limine issues. (0.4)	0.4	550	\$220.00	Peter E Berlowe	0.4	0	0	0	0	0	0	0	0
9/25/2024	Finalize Daubert Response and Prepare same for filing, compile all exhibits re same. (2.1)	2.1	500	\$1,050.00	Meredith J. Gussin	0	2.1	0	0	0	0	0	0	0
9/25/2024	Review and revise response to Daubert Motion. (0.6)	0.6	550	\$330.00	Peter E Berlowe	0.6	0	0	0	0	0	0	0	0
9/24/2024	Prepare response to Defendant's Motion in Limine; legal research in support of same. (3.2)	3.2	500	\$1,600.00	Meredith J. Gussin	0	3.2	0	0	0	0	0	0	0
9/24/2024	Working with Meredith Gussin on motion in limine and response to Daubert Motion. (0.35)	0.35	550	\$192.50	Peter E Berlowe	0.35	0	0	0	0	0	0	0	0
9/23/2024	Revise and file Motion in Limine; continue legal research in support of response to Daubert Motion; drafting and analysis of same. (7.1)	7.1	500	\$3,550.00	Meredith J. Gussin	0	7.1	0	0	0	0	0	0	0
9/23/2024	Reviewing and revising motion in limine. Conference with Meredith Gussin regarding same. (0.4)	0.4	550	\$220.00	Peter E Berlowe	0.4	0	0	0	0	0	0	0	0
9/22/2024	Draft Motion in Limine. (1.8)	1.8	500	\$900.00	Meredith J. Gussin	0	1.8	0	0	0	0	0	0	0
9/20/2024	Continue working on Daubert Motion, focusing on section as to Dr. Michael DiTomasso. (7.1)	7.1	500	\$3,550.00	Meredith J. Gussin	0	7.1	0	0	0	0	0	0	0
9/19/2024	Continue working on response to Daubert Motion; (3.1) review Sheri Fiske's deposition; (0.7) review damages report and updated schedules; (0.8) analysis re same; (0.6) legal research regarding standard applied to striking CPA, etc. (1.5)	6.7	500	\$3,350.00	Meredith J. Gussin	0	6.7	0	0	0	0	0	0	0
9/19/2024	Reviewing and revising portions of response to Daubert Motion. (0.7) Conference with Meredith Gussin regarding same. (0.5)	1.2	550	\$660.00	Peter E Berlowe	1.2	0	0	0	0	0	0	0	0
9/18/2024	Review deposition of Sheri Fiske; (1.2) Review Fiske report; (0.8)draft argument section re Fiske. (1.2)	3.2	500	\$1,600.00	Meredith J. Gussin	0	3.2	0	0	0	0	0	0	0
9/17/2024	Work on Daubert Response. (2.5)	2.5	500	\$1,250.00	Meredith J. Gussin	0	2.5	0	0	0	0	0	0	0
9/16/2024	Read and review Defendant's Motion to Strike Expert Witnesses; (1.6) prepare Motion for Extension of Time to respond to Daubert Motion; (0.3) prepare proposed order; (0.2) correspondence with Court. (0.1)	2.2	500	\$1,100.00	Meredith J. Gussin	0	2.2	0	0	0	0	0	0	0
9/16/2024	Multiple conferences with Meredith Gussin regarding responding to Daubert motion. (0.65)	0.65	550	\$357.50	Peter E Berlowe	0.65	0	0	0	0	0	0	0	0
9/15/2024	Finalize Reply and File same. (1.2)	1.2	500	\$600.00	Meredith J. Gussin	0	1.2	0	0	0	0	0	0	0
9/15/2024	Review and revise reply in support of partial motion for summary judgment. (0.9) Calls and emails with Meredith Gussin regarding finalizing same. (0.35)	1.25	550	\$687.50	Peter E Berlowe	1.25	0	0	0	0	0	0	0	0
9/14/2024	Review and revise reply in support of partial motion for summary judgment. (0.5)	0.5	550	\$275.00	Peter E Berlowe	0.5	0	0	0	0	0	0	0	0
9/13/2024	continue legal research regarding affirmative defense of duress so as to support summary judgment motion. (3.1)	3.1	500	\$1,550.00	Meredith J. Gussin	0	3.1	0	0	0	0	0	0	0
9/13/2024	Conference with Meredith Gussin on Ronda McNae's duress defense. (0.3) Legal research regarding same. (0.3)	0.6	550	\$330.00	Peter E Berlowe	0.6	0	0	0	0	0	0	0	0
9/12/2024	Continue drafting and legal research in support of Reply Brief in Support of Partial Summary Judgment as to Liability. (5.7)	5.7	500	\$2,850.00	Meredith J. Gussin	0	5.7	0	0	0	0	0	0	0
9/12/2024	Legal research related to reply in support of partial motion for summary judgment. (0.8) Calls with Meredith Gussin regarding same. (0.4)	1.2	550	\$660.00	Peter E Berlowe	1.2	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
9/11/2024	Legal research for reply in support of motion for partial summary judgment; (2.2)draft reply brief. (6.2)	8.4	500	\$4,200.00	Meredith J. Gussin	0	8.4	0	0	0	0	0	0	0
9/11/2024	Working with Meredith Gussin on issues related to reply in support of partial motion for summary judgment. (1.6) Legal research in relation to same. (0.6)	2.2	550	\$1,210.00	Peter E Berlowe	2.2	0	0	0	0	0	0	0	0
9/10/2024	Continue review and analysis of Defendant's Motion to Strike Expert Witnesses; (0.7) review exhibits to Motion and analysis of responses; (1.2) review Response to Plaintiff's Motion for Summary Judgment as to Liability and exhibits thereto; (1.8) legal research and analysis of possible defenses thereto. (0.5)	4.2	500	\$2,100.00	Meredith J. Gussin	0	4.2	0	0	0	0	0	0	0
9/10/2024	Working with Meredith Gussin related to responding to Ronda McNae's Daubert Motion and our reply in support of partial motion for summary judgment. (1.4)	1.4	550	\$770.00	Peter E Berlowe	1.4	0	0	0	0	0	0	0	0
9/9/2024	Review Daubert Motion to Strike. (1.0)	1	500	\$500.00	Meredith J. Gussin	0	1	0	0	0	0	0	0	0
9/3/2024	Review William McNae's Objections to report and recommendation regarding Motion for Fees and Costs; (0.6) legal research re same; (0.4) prepare response in opposition to objections and file same. (1.8)	2.8	500	\$1,400.00	Meredith J. Gussin	0	2.8	0	0	0	0	0	0	0
8/30/2024	Call with Mike Fitzgerald regarding sending settlement proposal. (0.3) Draft and send settlement proposal to opposing counsel. (0.3)	0.6	550	\$330.00	Peter E Berlowe	0.6	0	0	0	0	0	0	0	0
8/29/2024	Finalize Response in Opposition to Objections to R&R and file same; (0.9) legal research and analysis as to availability of punitive damages for breach of non-disparagement provision of the contract. (0.4)	1.3	500	\$650.00	Meredith J. Gussin	0	1.3	0	0	0	0	0	0	0
8/29/2024	Emails with Meredith Gussin regarding punitive damages in our breach of contract claim. (0.1) Review Order adopting report and recommendation denying Ronda McNae Sanctions. (0.1) Finalize response to objection to report and recommendation denying Fees to Ronda McNae against Yelany De Varona. (0.8) Review Order adopting report and recommendation denying fees to Ronda McNae against Yelany De Varona. (0.2)	0.2	550	\$110.00	Peter E Berlowe	0.2	0	0	0	0	0	0	0	0
8/28/2024	Prepare Response in Opposition to R. McNae's Objection to report and recommendation on R. McNae's Motion for Attorney's Fees and Costs as to Yelany de Varona. (2.8)	2.8	500	\$1,400.00	Meredith J. Gussin	0	2.8	0	0	0	0	0	0	0
8/28/2024	Legal research regarding damages available for a breach of a non-disparagement provision. (1.2)	1.2	500	\$600.00	Meredith J. Gussin	0	1.2	0	0	0	0	0	0	0
8/28/2024	Emails and calls with Meredith Gussin regarding opposing counsel's questions as to which experts we still intend to call at trial. (0.3)Legal research on measure of damages for breach non-disparagement contracts, along with punitive damages. (0.4).	0.7	550	\$385.00	Peter E Berlowe	0.7	0	0	0	0	0	0	0	0
8/27/2024	Analysis of expert witnesses needed for trial. (0.8)	0.8	500	\$400.00	Meredith J. Gussin	0	0.8	0	0	0	0	0	0	0
8/27/2024	Emails and call with Meredith Gussin regarding responding to objections to report and recommendation. (0.5)	0.5	550	\$275.00	Peter E Berlowe	0.5	0	0	0	0	0	0	0	0
8/26/2024	Review McNae's objections to report and recommendations on motion for attorney's fees against Yelany pursuant to offer of settlement. (0.5)	0.5	500	\$250.00	Meredith J. Gussin	0	0.5	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
8/26/2024	Emails with opposing counsel regarding Daubert deadlines. (0.1) Discuss parties' expert witnesses with Meredith Gussin. (0.3) Review objection to report and recommendation denying Ronda McNae fees and costs. (0.8)	1.2	550	\$660.00	Peter E Berlowe	1.2	0	0	0	0	0	0	0	0
8/23/2024	Review order granting Plaintiff's Motion to Dismiss Counterclaim and Motion to Strike Affirmative Defenses; (0.3) discuss same with PEB; (0.3) strategize going forward. (0.3)	0.9	500	\$450.00	Meredith J. Gussin	0	0.9	0	0	0	0	0	0	0
8/23/2024	Review Order from Judge Martinez dismissing Ronda McNae's counterclaim and striking 5 of 6 defenses we requested stricken. (0.4) Draft email to Mike Fitzgerald regarding same. (0.3) Discuss Order with Meredith Gussin and how it shapes the upcoming trial. (1.05)	1.75	550	\$962.50	Peter E Berlowe	1.75	0	0	0	0	0	0	0	0
8/22/2024	Review report and recommendation on motion to bifurcate. (0.6)	0.6	500	\$300.00	Meredith J. Gussin	0	0.6	0	0	0	0	0	0	0
8/21/2024	Review report and recommendation; analysis of same; (0.75) correspondence to client; (0.25) review status of case and remaining pending motions and trial ready status. (0.4)	1.4	500	\$700.00	Meredith J. Gussin	0	1.4	0	0	0	0	0	0	0
8/19/2024	Review motion filed late last night by opposing counsel on motion for summary judgment response. (0.05) Discuss with Meredith Gussin. (0.05) Review paperless order granting motion. (0.05)	0.15	550	\$82.50	Peter E Berlowe	0.15	0	0	0	0	0	0	0	0
8/15/2024	Emails with Meredith Gussin regarding preparing for trial and other case issues. (0.3) Call with Meredith Gussin regarding same. (0.35)	0.65	550	\$357.50	Peter E Berlowe	0.65	0	0	0	0	0	0	0	0
8/14/2024	Emails with Mike Fitzgerald regarding distinction of a Report and Recommendation from a Magistrate, as opposed to an Order. (0.1)	0.1	550	\$55.00	Peter E Berlowe	0.1	0	0	0	0	0	0	0	0
8/13/2024	Review reports and recommendations; (0.9) discuss status with PEB (0.5)	1.4	500	\$700.00	Meredith J. Gussin	0	1.4	0	0	0	0	0	0	0
8/13/2024	Review report and recommendation denying Ronda McNae's motion for sanctions. (0.6) Review report and commendation denying Ronda McNae fees against Yelany De Varona. (0.4) Draft email to clients regarding these two important orders in their favor. (0.1) Discuss Orders with Meredith Gussin. (0.5)	1.6	550	\$880.00	Peter E Berlowe	1.6	0	0	0	0	0	0	0	0
8/12/2024	Finalize and file Motion for Summary Judgment. (2.6)	2.6	500	\$1,300.00	Meredith J. Gussin	0	2.6	0	0	0	0	0	0	0
8/9/2024	Final editing to Motion for Summary Judgment and Statement of Material Facts. (3.4)	3.4	500	\$1,700.00	Meredith J. Gussin	0	3.4	0	0	0	0	0	0	0
8/9/2024	Working with Meredith Gussin on partial motion for summary judgment and statement of facts. (0.75)	0.75	550	\$412.50	Peter E Berlowe	0.75	0	0	0	0	0	0	0	0
8/7/2024	Continue working on Motion for Partial Summary Judgment. (4.3)	4.3	500	\$2,150.00	Meredith J. Gussin	0	4.3	0	0	0	0	0	0	0
8/7/2024	Begin reviewing and revising partial motion for summary judgment provided by Meredith Gussin. (1.2) Discuss same with Meredith Gussin. (0.4)	1.6	550	\$880.00	Peter E Berlowe	1.6	0	0	0	0	0	0	0	0
8/6/2024	Work on Motion for Summary Judgment. (4.2)	4.2	500	\$2,100.00	Meredith J. Gussin	0	4.2	0	0	0	0	0	0	0
8/6/2024	Emails with Mike Fitzgerald regarding case status. (0.1)	0.1	550	\$55.00	Peter E Berlowe	0.1	0	0	0	0	0	0	0	0
8/5/2024	Emails with Mike Fitzgerald regarding case status. (0.15)	0.15	550	\$82.50	Peter E Berlowe	0.15	0	0	0	0	0	0	0	0
7/31/2024	Work on Motion for Summary Judgment. (1.4)	1.4	500	\$700.00	Meredith J. Gussin	0	1.4	0	0	0	0	0	0	0
7/29/2024	review court order regarding motion to strike amended exhibit list. (0.4)	0.4	500	\$200.00	Meredith J. Gussin	0	0.4	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
7/29/2024	Review Order denying motion to strike late witnesses due they are only being listed for rebuttal purposes and not case in chief. (0.3)	0.3	550	\$165.00	Peter E Berlowe	0.3	0	0	0	0	0	0	0	0
7/26/2024	Review Order denying motion to strike late witnesses due they are only being listed for rebuttal purposes and not case in chief. (0.4)	0.4	550	\$220.00	Peter E Berlowe	0.4	0	0	0	0	0	0	0	0
7/15/2024	Work on draft of Motion for Summary Judgment and review statement of facts; (3.4) correspondence with opposing counsel regarding meet and confer. (0.4)	3.8	500	\$1,900.00	Meredith J. Gussin	0	3.8	0	0	0	0	0	0	0
7/2/2024	Emails and call with Meredith Gussin regarding her meet and confer on summary judgment issues. (0.25)	0.25	550	\$137.50	Peter E Berlowe	0.25	0	0	0	0	0	0	0	0
6/30/2024	Continue working on Motion for Summary Judgment. (6.2)	6.2	500	\$3,100.00	Meredith J. Gussin	0	6.2	0	0	0	0	0	0	0
6/27/2024	Emails with Meredith Gussin and Richard Gomez on Ronda McNae's request for extension of time and joint statement of stipulated facts for purposes of summary judgment. (0.25)	0.25	550	\$137.50	Peter E Berlowe	0.25	0	0	0	0	0	0	0	0
6/26/2024	Correspondence with Richard Gomez regarding status of deadlines; (0.2) review proposed motion for enlargement of time; (0.2) discuss same with PEB; (0.2) review draft of Motion for Summary Judgment. (0.8)	1.4	500	\$700.00	Meredith J. Gussin	0	1.4	0	0	0	0	0	0	0
6/26/2024	Reviewing portions of draft summary judgment motion. (0.35) Emails with Meredith Gussin and Richard Gomez regarding upcoming pretrial deadlines. (0.2) Call with Meredith Gussin regarding same. (0.2)	0.75	550	\$412.50	Peter E Berlowe	0.75	0	0	0	0	0	0	0	0
6/25/2024	Work on summary judgment motion. (2.0)	2	500	\$1,000.00	Meredith J. Gussin	0	2	0	0	0	0	0	0	0
6/25/2024	Reviewing portions of draft summary judgment motion. (0.35)	0.35	550	\$192.50	Peter E Berlowe	0.35	0	0	0	0	0	0	0	0
6/24/2024	Work on Motion for Summary Judgment; (3.1) review documentation. (0.9)	3.8	500	\$1,900.00	Meredith J. Gussin	0	3.8	0	0	0	0	0	0	0
6/24/2024	Reviewing drafts summary judgment and statement of facts in support. (1.2) Comparing production documents and deposition testimony to same. (0.6)	1.8	550	\$990.00	Peter E Berlowe	1.8	0	0	0	0	0	0	0	0
6/23/2024	Work on Statement of Material Facts, Revise same. (2.1)	2.1	500	\$1,050.00	Meredith J. Gussin	0	2.1	0	0	0	0	0	0	0
6/21/2024	Work on Statement of Facts; (1.4) motion for summary judgment. (2.8)	4.2	500	\$2,100.00	Meredith J. Gussin	0	4.2	0	0	0	0	0	0	0
6/21/2024	Reviewing summary judgment draft and statement of facts draft. (1.75)	1.75	550	\$962.50	Peter E Berlowe	1.75	0	0	0	0	0	0	0	0
6/20/2024	Work on statement of facts; review of evidence; (1.3) review of affirmative defenses and analysis of caselaw. (1.2)	3.6	500	\$1,800.00	Meredith J. Gussin	0	3.6	0	0	0	0	0	0	0
6/20/2024	Conferences with Meredith Gussin on key facts for motion for summary judgment. (0.5) Reviewing case production to find documents in support of motion for summary judgment. (1.6)	2.1	550	\$1,155.00	Peter E Berlowe	2.1	0	0	0	0	0	0	0	0
6/18/2024	Work on Motion for Summary Judgment; Joint Statement of Facts. (3.1)	3.1	500	\$1,550.00	Meredith J. Gussin	0	3.1	0	0	0	0	0	0	0
6/18/2024	Conference with Meredith Gussin on issues for summary judgment motion and key fact for statement of facts in support. (1.1) Reviewing case documents in support thereof. (0.75)	1.85	550	\$1,017.50	Peter E Berlowe	1.85	0	0	0	0	0	0	0	0
6/11/2024	Reviewing case documents for partial motion for summary judgment. (1.35)	1.35	550	\$742.50	Peter E Berlowe	1.35	0	0	0	0	0	0	0	0
6/10/2024	Developing strategy for partial motion for summary judgment. (1.1)	1.1	550	\$605.00	Peter E Berlowe	1.1	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
6/7/2024	Reviewing case documents to establish grounds for partial motion for summary judgment. (1.25)	1.25	550	\$687.50	Peter E Berlowe	1.25	0	0	0	0	0	0	0	0
6/5/2024	Reviewing case documents for partial motion for summary judgment. (1.1)	1.1	550	\$605.00	Peter E Berlowe	1.1	0	0	0	0	0	0	0	0
6/3/2024	Reviewing case documents to establish grounds for partial motion for summary judgment. (1.35)	1.35	550	\$742.50	Peter E Berlowe	1.35	0	0	0	0	0	0	0	0
5/9/2024	Emails and conference with Meredith Gussin regarding merits/detriments of Rule 11 motion regarding Ronda McNae motion for sanctions to spur new counsel to withdraw motion. (0.6)	0.6	550	\$330.00	Peter E Berlowe	0.6	0	0	0	0	0	0	0	0
5/6/2024	Review docket re outstanding issues and issues pending before Magistrate; (0.4) prepare 90 day notice as to Plaintiff's Motion to Dismiss Counterclaim. (0.2)	0.6	500	\$300.00	Meredith J. Gussin	0	0.6	0	0	0	0	0	0	0
5/6/2024	Conference with Meredith Gussin on strategy for pretrial motions and trial strategy. (0.8) Review outstanding docket issues. (0.4)	1.2	550	\$660.00	Peter E Berlowe	1.2	0	0	0	0	0	0	0	0
4/19/2024	Telephone call with client, PEB re settlement agreement terms; communication with opposing counsel regarding rejection of draft. (0.6)	0.6	500	\$300.00	Meredith J. Gussin	0	0.6	0	0	0	0	0	0	0
4/19/2024	Discuss revised settlement agreement with Meredith Gussin. (0.1) Emails with Meredith Gussin and Mike Fitzgerald regarding same. Telephone call with Meredith Gussin and Mike Fitzgerald. (0.6) Emails with opposing counsel regarding impasse in settlement discussions. (0.05)	0.75	550	\$412.50	Peter E Berlowe	0.75	0	0	0	0	0	0	0	0
4/18/2024	review edits to settlement agreement. (0.5)	0.5	500	\$250.00	Meredith J. Gussin	0	0.5	0	0	0	0	0	0	0
4/18/2024	Review revised settlement agreement proposed by Will McNae's counsel. (0.1) Discuss same with Meredith Gussin. (0.2) Emails with Meredith Gussin and Mike Fitzgerald regarding same. (0.1)	0.4	550	\$220.00	Peter E Berlowe	0.4	0	0	0	0	0	0	0	0
4/17/2024	Various correspondence regarding settlement agreement; (0.35) edit and revise same; (0.7) communicate updated version to opposing counsel. (0.15)	1.1	500	\$550.00	Meredith J. Gussin	0	1.1	0	0	0	0	0	0	0
4/17/2024	Emails with Will McNae Federal Case counsel regarding settlement agreement. (.01) Review and revise draft settlement agreement with Meredith Gussin. (0.4)	0.5	550	\$275.00	Peter E Berlowe	0.5	0	0	0	0	0	0	0	0
4/15/2024	Review draft settlement agreement received from Stephanie Casey; (0.6) edit and add additional provisions; (0.5) discussion with PEB re same; (0.15) correspondence with client re same. (0.15)	1.4	500	\$700.00	Meredith J. Gussin	0	1.4	0	0	0	0	0	0	0
4/15/2024	Review draft settlement agreement from Will McNae. (0.2) Discuss same with Meredith Gussin. (0.15)	0.35	550	\$192.50	Peter E Berlowe	0.35	0	0	0	0	0	0	0	0
4/12/2024	Correspondence with Stephanie Casey regarding settlement negotiations. (0.3)	0.3	500	\$150.00	Meredith J. Gussin	0	0.3	0	0	0	0	0	0	0
4/12/2024	Emails with Mike Fitzgerald and Meredith Gussin regarding potential settlement with Will McNae. (0.3) Call with Meredith Gussin regarding same. (0.25) Emails with Expert Fiske on expert bill for Mike Fitzgerald pending. (0.3) Forward bill to Mike Fitzgerald. Emails with Will McNae's counsel. (0.3) Emails with case team and opposing counsel regarding Yelany being part of release. (0.5)	1.75	550	\$962.50	Peter E Berlowe	1.75	0	0	0	0	0	0	0	0
4/11/2024	Call with Meredith Gussin regarding responding to Will McNae Settlement Offer. (0.1) Review and revise response to settlement offer. (0.25)	0.35	550	\$192.50	Peter E Berlowe	0.35	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
4/9/2024	Review emails from opposing counsel to Judge Martinez. (0.2) Call with Meredith Gussin. (0.45) Review Order extending pretrial deadlines. (0.1)	0.75	550	\$412.50	Peter E Berlowe	0.75	0	0	0	0	0	0	0	0
4/8/2024	Correspondence with opposing counsel regarding motion for extension of time; (0.4) various revisions of same. (0.5)	0.9	500	\$450.00	Meredith J. Gussin	0	0.9	0	0	0	0	0	0	0
4/8/2024	Conference call with Meredith Gussin on case status and strategy. (0.8) Review docket of Washington State bad faith insurance case. (0.5) Review Order from Court on Ronda McNae's motion to strike her own filings. (0.2) Emails with Meredith Gussin on opposing counsel's wanting to move certain case deadlines. (0.25)	1.75	550	\$962.50	Peter E Berlowe	1.75	0	0	0	0	0	0	0	0
4/8/2024	4/8/ 331 Review emails from opposing counsel to Judge Martinez. (0.15) Call with Meredith Gussin. (0.45) Review Order extending pretrial deadlines. (0.15)	0.75	550	\$412.50	Peter E Berlowe	0.75	0	0	0	0	0	0	0	0
4/5/2024	Review Order from Clerk of Court directing Ronda McNae's new lawyer to comply with the Rules of Court within 3 days. (0.1) Discuss with Meredith Gussin. (0.1) Review revised filings filed by Ronda McNae's new attorney now that he knows he has to sign filings. (0.05)	0.25	550	\$137.50	Peter E Berlowe	0.25	0	0	0	0	0	0	0	0
4/4/2024	Review filings by new lawyer appearing on behalf of Ronda McNae in Federal case. (0.15) Discuss with Meredith Gussin. (0.2)	0.35	550	\$192.50	Peter E Berlowe	0.35	0	0	0	0	0	0	0	0
3/28/2024	Review Order reassigning case to Magistrate Eduardo Sanchez. (0.05) Forward Order to Mike Fitzgerald. (0.1)	0.15	550	\$82.50	Peter E Berlowe	0.15	0	0	0	0	0	0	0	0
3/27/2024	Emails with Mike Fitzgerald regarding things he wants to post on LinkedIn. (0.15)	0.15	550	\$82.50	Peter E Berlowe	0.15	0	0	0	0	0	0	0	0
3/25/2024	Status conference with Mike Fitzgerald. (0.3)	0.3	550	\$165.00	Peter E Berlowe	0.3	0	0	0	0	0	0	0	0
3/15/2024	Status conference with Mike Fitzgerald regarding case issues. (0.25)	0.25	550	\$137.50	Peter E Berlowe	0.25	0	0	0	0	0	0	0	0
3/13/2024	Emails with case team regarding Ronda McNae's appealing bar complaint against Meredith Gussin. (0.2) Call with Eric Assouline regarding same. (0.4)	0.4	550	\$220.00	Peter E Berlowe	0.4	0	0	0	0	0	0	0	0
3/11/2024	Emails with Meredith Gussin regarding Ronda McNae trying to get closing of ethics complaint against her reopened. (0.35) Review letter from Florida Bar and McNae appeal. (0.4)	0.75	550	\$412.50	Peter E Berlowe	0.75	0	0	0	0	0	0	0	0
3/6/2024	Discuss terms of settlement communication with PEB; (0.3) correspond with opposing counsel re terms of same. (0.2)	0.5	500	\$250.00	Meredith J. Gussin	0	0.5	0	0	0	0	0	0	0
3/6/2024	Emails with opposing counsel for Will McNae and Meredith Gussin regarding settlement possibilities. (0.4)	0.4	550	\$220.00	Peter E Berlowe	0.4	0	0	0	0	0	0	0	0
3/5/2024	Review reply filed by Ronda McNae in support of her Motion for Sanctions. (1.2)	1.2	500	\$600.00	Meredith J. Gussin	0	1.2	0	0	0	0	0	0	0
3/5/2024	Review Ronda McNae Bar complaint against me and ruling closing immediately. (0.3) Forward same to Mike Fitzgerald. (0.1) Discuss same with Meredith Gussin. (0.3) Review Ronda McNae reply to motion for sanctions. (0.4)	1.1	550	\$605.00	Peter E Berlowe	1.1	0	0	0	0	0	0	0	0
3/1/2024	Telephone call with Stephanie Casey to discuss terms of settlement agreement; (0.4) review complaint by Ronda McNae and correspondence from the Florida bar. (0.7)	1.1	500	\$550.00	Meredith J. Gussin	0	1.1	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
3/1/2024	Emails and calls with Meredith Gussin regarding opposition to Ronda McNae's motion for sanctions. (0.2) Review Ronda McNae Bar complaint against Meredith Gussin and ruling closing immediately. (0.4) Forward same to Mike Fitzgerald. (0.1) Preparing trial strategy. (1.0)	1.7	550	\$935.00	Peter E Berlowe	1.7	0	0	0	0	0	0	0	0
2/28/2024	Marshalling case documents in support of trial strategy. (1.25) Emails with Stephanie Casey regarding settlement possibilities. (0.25)	1.5	550	\$825.00	Peter E Berlowe	1.5	0	0	0	0	0	0	0	0
2/27/2024	Finalize Response to Motion for Sanctions; (2.3) prepare all exhibits, including deposition excerpts; (1.4) review and revise motion and all exhibits; (0.3) finalize same for filing. (0.3)	4.3	500	\$2,150.00	Meredith J. Gussin	0	4.3	0	0	0	0	0	0	0
2/27/2024	Marshalling case documents in support of trial strategy. (0.4) Review and revise response to motion for sanctions. (0.2) Emails with Meredith Gussin regarding same. (0.1)	0.7	550	\$385.00	Peter E Berlowe	0.7	0	0	0	0	0	0	0	0
2/26/2024	Finalize Response to Motion for Sanctions. (1.4)	1.4	500	\$700.00	Meredith J. Gussin	0	1.4	0	0	0	0	0	0	0
2/26/2024	Marshalling case documents in support of trial strategy. (0.9) Review and revise response to motion for sanctions. (0.6)	1.5	550	\$825.00	Peter E Berlowe	1.5	0	0	0	0	0	0	0	0
2/23/2024	Prepare correspondence to Court re Will McNae Motion to Stay; (0.3) review, revise and edit Response to Motion for Sanctions (3.1) and discuss same with PEB. (0.3)	3.7	500	\$1,850.00	Meredith J. Gussin	0	3.7	0	0	0	0	0	0	0
2/23/2024	Working with Meredith Gussin on response to motion for stay. (0.9) Review and revise same. (0.5)	1.4	550	\$770.00	Peter E Berlowe	1.4	0	0	0	0	0	0	0	0
2/23/2024	Marshalling case documents in support of trial strategy. (0.8)	0.8	550	\$440.00	Peter E Berlowe	0.8	0	0	0	0	0	0	0	0
2/22/2024	Continue drafting response to motion for sanctions. (2.9)	2.9	500	\$1,450.00	Meredith J. Gussin	0	2.9	0	0	0	0	0	0	0
2/22/2024	Marshalling case documents in support of trial strategy. (0.9) Calls with Meredith Gussin on responding to motion for sanctions. (0.3) Legal research regarding same. (0.25)	1.45	550	\$797.50	Peter E Berlowe	1.45	0	0	0	0	0	0	0	0
2/21/2024	Work on Response to Motion for Sanctions (3.1)	3.1	500	\$1,550.00	Meredith J. Gussin	0	3.1	0	0	0	0	0	0	0
2/21/2024	Work with Meredith Gussin on issues related to response to motion for sanctions. (0.5) Legal research on inherent authority of court to sanction where rule 11 is not followed.(0.4) Marshalling case documents in support of trial strategy. (0.8)	1.7	550	\$935.00	Peter E Berlowe	1.7	0	0	0	0	0	0	0	0
2/20/2024	Conference with client, PEB to discuss settlement proposal from Will McNae and response thereto; (1.2) review and analysis of Motion for Sanctions; legal research in regard to Rule 11 safe harbor requirements; (1.2) begin to draft Response in Opposition to Motion for Sanctions. (3.0)	5.4	500	\$2,700.00	Meredith J. Gussin	0	5.4	0	0	0	0	0	0	0
2/20/2024	Conference call with Mike Fitzgerald regarding case status and strategy. (0.6) Marshalling case documents in support of trial strategy. (1.6) Conference with Meredith Gussin regarding motion for sanctions and response in opposition. (0.6)	2.8	550	\$1,540.00	Peter E Berlowe	2.8	0	0	0	0	0	0	0	0
2/16/2024	Marshalling case documents in support of trial strategy. (1.6)	1.6	550	\$880.00	Peter E Berlowe	1.6	0	0	0	0	0	0	0	0
2/15/2024	Review Ronda McNae Reply in Support of Motion for Fees and Costs as to de Varona. (0.1)	1	500	\$500.00	Meredith J. Gussin	0	1	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
2/15/2024	Review Ronda McNae's reply brief regarding motion for fees as to Yelany De Varona. (0.6) Call with Meredith Gussin regarding same. (0.3) Marshalling case documents in support of trial strategy. (0.4)	1.3	550	\$715.00	Peter E Berlowe	1.3	0	0	0	0	0	0	0	0
2/14/2024	Review Ronda McNae motion for sanctions; (0.7) discussion of same with PEB (0.4)	1.1	500	\$550.00	Meredith J. Gussin	0	1.1	0	0	0	0	0	0	0
2/14/2024	Conference with Meredith Gussin regarding case issues and strategy. (0.4) Review settlement offer from Will McNae's counsel in Federal Case. (0.35)	0.75	550	\$412.50	Peter E Berlowe	0.75	0	0	0	0	0	0	0	0
2/13/2024	Review Ronda McNae motion for sanctions. (0.6)	0.6	500	\$300.00	Meredith J. Gussin	0	0.6	0	0	0	0	0	0	0
2/13/2024	Conference call with Meredith Gussin on case status, issues and strategy. (1.6) Review Ronda McNae Motion for Sanctions. (0.6) Call Meredith Gussin regarding same. (0.2) Call with Eric Assouline regarding same. (0.2) Review Order of reference of motion for sanctions to Magistrate Becerra. (0.1)	2.7	550	\$1,485.00	Peter E Berlowe	2.7	0	0	0	0	0	0	0	0
2/12/2024	Reviewing case documents in arranging trial strategy. (1.25)	1.25	550	\$687.50	Peter E Berlowe	1.25	0	0	0	0	0	0	0	0
2/9/2024	Reviewing case document in support of trial strategy. (2.2)	2.2	550	\$1,210.00	Peter E Berlowe	2.2	0	0	0	0	0	0	0	0
2/8/2024	Edit, revise and finalize Opposition to Motion for Fees and Costs; prepare same for filing. (3.3)	3.3	500	\$1,650.00	Meredith J. Gussin	0	3.3	0	0	0	0	0	0	0
2/8/2024	Review and revise response in opposition to motion for attorney's fees as to Yelany De Varona. (2.1) Multiple conferences with Meredith Gussin regarding same. (0.6)	2.7	550	\$1,485.00	Peter E Berlowe	2.7	0	0	0	0	0	0	0	0
2/7/2024	Work on brief in opposition to Ronda McNae's motion for fees and costs. (2.9)	2.9	500	\$1,450.00	Meredith J. Gussin	0	2.9	0	0	0	0	0	0	0
2/7/2024	Work with Meredith Gussin on response in opposition to motion for attorney's fees as to Yelany De Varona. (1.5) Review and revise response. (0.5)	2	550	\$1,100.00	Peter E Berlowe	2	0	0	0	0	0	0	0	0
2/6/2024	Work on Response to Motion for Attorney's fees and costs; (4.0) review court order granting extension of time (0.1)	4.1	500	\$2,050.00	Meredith J. Gussin	0	4.1	0	0	0	0	0	0	0
2/6/2024	Reviewing case documents and preparing trial strategy. (1.0) Work with Meredith Gussin on response in opposition to motion for attorneys fees as to Yelany De Varona. (0.8)	1.8	550	\$990.00	Peter E Berlowe	1.8	0	0	0	0	0	0	0	0
2/5/2024	Review Order granting extension of trial deadlines. (0.1) Conference with case team regarding same. (0.15)	0.25	550	\$137.50	Peter E Berlowe	0.25	0	0	0	0	0	0	0	0
2/2/2024	Review R. McNae's Motion for Extension of Time; (0.1) communicate re same with PEB, Yelany; (0.2) analysis of pending issues and status of preparation towards trial. (0.7)	1	500	\$500.00	Meredith J. Gussin	0	1	0	0	0	0	0	0	0
2/2/2024	Review motion for extension of trial deadlines from Ronda McNae. (0.1) Discuss same with Meredith Gussin. (0.2) Call with Jenny Martinez. (0.25) Preparing trial strategy. (1.2)	1.75	550	\$962.50	Peter E Berlowe	1.75	0	0	0	0	0	0	0	0
2/1/2024	Finalize and file Reply in Support of Motion to Dismiss; (1.3) review correspondence with SoftwareONE; (0.2) discuss status of correspondence with PEB. (0.3)	1.6	500	\$800.00	Meredith J. Gussin	0	1.6	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
2/1/2024	Emails and extensive call with Jenny Martinez, counsel for SoftwareOne regarding Ronda McNae's off-the-wall filing. (0.5) Review attorneys' eyes only documents to fresh what they discuss. (1.6) Emails and phone call with Meredith Gussin regarding same. (0.6)	2.7	550	\$1,485.00	Peter E Berlowe	2.7	0	0	0	0	0	0	0	0
1/31/2024	Prepare Response to Motion for Extension of Pretrial Deadlines and file same with Court; (0.8) review various correspondence/threats from Ronda McNae and discuss same with PEB; (1.2) edit draft reply in support of Motion to dismiss. (1.4)	3.4	500	\$1,700.00	Meredith J. Gussin	0	3.4	0	0	0	0	0	0	0
1/31/2024	Conference with Meredith Gussin regarding our response to Ronda McNae's Motion for Extension of Pretrial Deadlines.(0.2) Review emails and threats from Ronda McNae and discuss same with Meredith Gussin. (0.2) Review and revise reply in support of Motion to dismiss. (0.7) Working on trial strategy. (0.3)	1.4	550	\$770.00	Peter E Berlowe	1.4	0	0	0	0	0	0	0	0
1/30/2024	Continue to research and draft Reply in Support of Motion to Dismiss Counterclaim and Motion to Strike Affirmative Defenses. (3.9)	3.9	500	\$1,950.00	Meredith J. Gussin	0	3.9	0	0	0	0	0	0	0
1/30/2024	Conference with Meredith Gussin regarding her research in support of her reply for our Motion to Dismiss Counterclaim and Motion to Strike Affirmative Defenses. (0.85) Developing trial strategy. (0.5)	1.35	550	\$742.50	Peter E Berlowe	1.35	0	0	0	0	0	0	0	0
1/29/2024	Legal research in response to R. McNae's response brief opposing motion to dismiss; (1.1) draft reply brief. (3.3)	4.4	500	\$2,200.00	Meredith J. Gussin	0	4.4	0	0	0	0	0	0	0
1/29/2024	Review emails from Ronda McNae. (0.25) Discuss same with Meredith Gussin. (0.2) Conference with Meredith Gussin regarding her legal research in response to Ronda McNae's response in opposition to motion to dismiss and client's reply brief. (0.8) Developing trial strategy. (2.0)	3.25	550	\$1,787.50	Peter E Berlowe	3.25	0	0	0	0	0	0	0	0
1/27/2024	Review correspondence from R. McNae. (0.1)	0.1	500	\$50.00	Meredith J. Gussin	0	0.1	0	0	0	0	0	0	0
1/25/2024	Review Ronda McNae's Motion for Fees and Costs as to Yelany de Varona; (0.5) Review Ronda McNae's Motion in Opposition to Motio to Dismiss; (0.6) Review all exhibits thereto; (0.15) analysis re same; various correspondence re motions. (0.25)	1.6	500	\$800.00	Meredith J. Gussin	0	1.6	0	0	0	0	0	0	0
1/25/2024	Review Ronda McNae's Motion for Fees and Costs on Yelany de Varona's dismissed claim. (0.3) Review Ronda McNae's Response in Opposition to Motion to Dismiss and attached exhibits thereto. (1.0) Emails with case team regarding same. (0.3) Call with Meredith Gussin regarding Ronda McNae filings. (0.5) Developing trial strategy. (0.3) Zoom conference with Mike Fitzgerald on case issues. (0.7)	3.1	550	\$1,705.00	Peter E Berlowe	3.1	0	0	0	0	0	0	0	0
1/24/2024	Review order on Motion for Reconsideration. (0.2)	0.2	500	\$100.00	Meredith J. Gussin	0	0.2	0	0	0	0	0	0	0
1/24/2024	Review Order on Ronda McNae's motion for reconsideration. (0.2) Discuss same with Meredith Gussin. (0.3) Marshalling case evidence in support of trial preparation. (2.4)	2.9	550	\$1,595.00	Peter E Berlowe	2.9	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
1/23/2024	Review Ronda McNae's motion for reconsideration. (0.7) Emails from and to Ronda McNae and case team. (0.4) Conference with Meredith Gussin regarding today's activity from Ronda McNae. (0.2) Strategize with Meredith Gussin on trial strategy. (0.4) Developing trial strategy. (1.6)	3.3	550	\$1,815.00	Peter E Berlowe	3.3	0	0	0	0	0	0	0	0
1/22/2024	Review motion for reconsideration (0.8) and emails from Ronda McNae; (0.1) discuss same with PEB. (0.2)	1.1	500	\$550.00	Meredith J. Gussin	0	1.1	0	0	0	0	0	0	0
1/22/2024	Review Ronda McNae email threatening Bar Complaint. (0.15) Discuss same with Meredith Gussin. (0.25) Emails amongst case team and Ronda McNae. (0.4) Review motion for reconsideration filed by Ronda McNae. (0.4) Discuss same with Meredith Gussin. (0.3) Developing trial strategy. (1.6)	3.1	550	\$1,705.00	Peter E Berlowe	3.1	0	0	0	0	0	0	0	0
1/21/2024	Review email re bar complaint from Ronda McNae; (0.6) review prior correspondence. (0.2)	0.8	500	\$400.00	Meredith J. Gussin	0	0.8	0	0	0	0	0	0	0
1/19/2024	Review various correspondence from Ronda McNae (0.8)	0.8	500	\$400.00	Meredith J. Gussin	0	0.8	0	0	0	0	0	0	0
1/19/2024	Emails from and to Ronda McNae with case team. (0.3) Conference with Meredith Gussin regarding same. (0.4) Developing case strategy and trial preparation. (1.7)	2.4	550	\$1,320.00	Peter E Berlowe	2.4	0	0	0	0	0	0	0	0
1/18/2024	Review correspondence with Ronda McNae, (0.6) review motions in opposition to extension motions. (1.0)	1.6	500	\$800.00	Meredith J. Gussin	0	1.6	0	0	0	0	0	0	0
1/18/2024	Emails to and from case team from Ronda McNae. (0.3) Review Ronda McNae motions in opposition to extension motions. (0.95)	1.25	550	\$687.50	Peter E Berlowe	1.25	0	0	0	0	0	0	0	0
1/17/2024	Work with Meredith Gussin in responding to McNaes' desire for revised settlement attempts. (0.6) Emails with opposing counsel regarding same. (0.20) Review Order on Trial Procedures received today. (0.5) Emails with Meredith Gussin on case strategy. (0.4) Scheduling meet and confer with opposing counsel for Will McNae on fees motion. (0.2) Email to Mike Fitzgerald regarding settlement issues. (0.3) Calls with Meredith Gussin and Eric Assouline regarding bifurcating liability for fees from amount of fees entitlement is established. (0.9)	3.1	550	\$1,705.00	Peter E Berlowe	3.1	0	0	0	0	0	0	0	0
1/17/2024	Review Ronda McNae Motion for Enlargement of Time to Respond to Motion to Dismiss; (0.25) REview Ronda McNae' Motion for Extension of Pretrial Deadlines and Trial Date; (0.25) various correspondence with Ronda McNae re same; (0.3) review correspondence to Court and proposed orders; (0.3) Draft Response in Opposition to Motion for Enlargement of Time; (2.8) communicate with PEB re same. (0.5)	4.4	500	\$2,200.00	Meredith J. Gussin	0	4.4	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
1/17/2024	Review Ronda McNae's Motion for Enlargement of Time to Respond to Motion to Dismiss. (0.3) Discuss same with Meredith Gussin. (0.3) Review Ronda McNae' Motion for Extension of Pretrial Deadlines and Trial Date, (0.2) and discuss same with Meredith Gussin. (0.3) Emails with Meredith Gussin and Ronda McNae re same. (0.3) Review Ronda McNae correspondence to Court and proposed orders and discuss with Meredith Gussin. (0.3) Conference with Meredith Gussin regarding her drafting Response in Opposition to Motion for Enlargement of Time. (1.5)	3.2	550	\$1,760.00	Peter E Berlowe	3.2		0	0	0	0	0	0	0
1/16/2024	Emails and phone conference with Meredith Gussin on case status and strategy in light of Ronda McNae's positions she is taking and pro se status. (1.8) Review unopposed motion for extension of time. (0.1)	1.9	550	\$1,045.00	Peter E Berlowe	1.9		0	0	0	0	0	0	0
1/12/2024	Research case law regarding spectrum of damages as to individual harm for breach of non-disparagement agreement. (1.0)	1	400	\$400.00	Daniel B. McCain	0		0	0	0	0	1	0	0
1/12/2024	Review and analysis of W. McNae reply brief in support of his Motion for Fees and Costs; (1.4) telephone call with process server re attempt to serve W. McNae. (0.1)	1.5	500	\$750.00	Meredith J. Gussin	0		1.5	0	0	0	0	0	0
1/12/2024	Review William McNae's reply brief in support of his Motion for Fees and Costs. (1.2) Discuss with Meredith Gussin. (0.2) Conference with Daniel McCain regarding his scope of damages research for breach of non-disparagement contract. (0.3)	1.7	550	\$935.00	Peter E Berlowe	1.7		0	0	0	0	0	0	0
1/11/2024	Correspondence with R. McNae; (0.2) review R. McNae Notice to Proceed Pro Se; (0.1) draft Motion for Extension of Time for Pretrial and Trial Deadlines; (0.7) Correspondence to Court with proposed order. (0.1)	1.2	500	\$600.00	Meredith J. Gussin	0		1.2	0	0	0	0	0	0
1/11/2024	Review emails from Ronda McNae. (0.2) Discuss same with Meredith Gussin and strategy for reply. (0.2) Review Ronda McNae's Notice to Proceed Pro Se. (0.1) Conference with Meredith Gussin regarding Motion for Extension of Time for Pre-trial and Trial Deadlines. (0.3) Review and revise draft of same. (0.2)	1	550	\$550.00	Peter E Berlowe	1		0	0	0	0	0	0	0
1/10/2024	Developing trial strategy and marshalling case evidence in that regard. (0.4)	0.4	550	\$220.00	Peter E Berlowe	0.4		0	0	0	0	0	0	0
1/9/2024	Working on trial strategy and marshalling of documentary support for same. (1.0)	1	550	\$550.00	Peter E Berlowe	1		0	0	0	0	0	0	0
1/8/2024	Developing trial strategy. (0.6)	0.6	550	\$330.00	Peter E Berlowe	0.6		0	0	0	0	0	0	0
1/5/2024	Revise, edit and finalize opposition to Verified Motion for Attorney's Fees and Costs; (1.1) review W. McNae's opposition to Plaintiffs' Motion to Bifurcate; (1.0) analysis of case law cited therein; (0.7) Draft Reply brief in support of Motion to Bifurcate; (2.2) finalize both briefs for Court filing. (0.5)	5.25	500	\$2,625.00	Meredith J. Gussin	0		5.25	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
1/5/2024	Review and revise opposition to Will McNae Motion for Attorney's Fees and Costs. (0.4) Review Will McNae's opposition to Plaintiffs' Motion to Bifurcate. (0.3) Discuss case law cited from opposition to motion to bifurcate with Meredith Gussin. (0.4) Conference with Meredith Gussin regarding reply brief in support of Motion to Bifurcate. (0.3) Review and revise draft reply briefs forwarded by Meredith Gussin. (1.5)	2.9	550	\$1,595.00	Peter E Berlowe	2.9		0	0	0	0	0	0	0
1/4/2024	Draft Brief in Opposition to W. McNae's Verified Motion for Fees and Costs; (5.5) Legal Analysis of all cases cited in Motion and review of cases in opposition to same. (1.6)	7.1	500	\$3,550.00	Meredith J. Gussin	0	7.1	0	0	0	0	0	0	0
1/4/2024	Emails and calls with Meredith Gussin regarding issue related to response to Will McNae motion for fees. (1.4) Reviewing case law regarding same. (1.1) Call with Daniel McCain regarding his research. (0.7)	3.2	550	\$1,760.00	Peter E Berlowe	3.2		0	0	0	0	0	0	0
1/3/2024	Review Verified Motion for Attorney's Fees and Costs, all invoices, cost sheets, declarations etc in support of same; (3.9) begin drafting opposition brief. (2.1)	6	500	\$3,000.00	Meredith J. Gussin	0	6	0	0	0	0	0	0	0
1/2/2024	Review and summarize Rowell case in context of impact rule, especially as concerned to a limited exception where lack of physical injury did not preclude non-economic damages. (0.8)	0.8	400	\$320.00	Daniel B. McCain	0	0	0	0	0	0.8	0	0	0
1/2/2024	Conferral re settlement with PEB, S. Casey; (0.3) analysis of issues pending regarding W. McNae's fees motion. (0.9)	1.2	500	\$600.00	Meredith J. Gussin	0	1.2	0	0	0	0	0	0	0
1/2/2024	Review email from Ronda McNae attaching legal insurance card. (0.15) Emails to Ronda McNae regarding same. (0.15) Telephone conference with Meredith Gussin on case issues and strategy. (0.9) Review McNae claim of Instagram stalking. (0.2) Emails and call with Meredith Gussin regarding same. (0.3)	1.7	550	\$935.00	Peter E Berlowe	1.7		0	0	0	0	0	0	0
1/2/2024	Conference with Meredith Gussin regarding motion for attorneys fees and responding thereto.(1.2) Conference with Daniel McCain regarding his legal research. (0.7)	1.9	550	\$1,045.00	Peter E Berlowe	1.9		0	0	0	0	0	0	0
12/29/2023	Research and provide summary of breach of confidentiality in context of impact rule for 2nd and 4th DCAs. (2.0)	2	400	\$800.00	Daniel B. McCain	0	0	0	0	0	2	0	0	0
12/29/2023	Review and analyze Rowell rule as expansion of an exception to the impact rule. (1.2)	1.2	400	\$480.00	Daniel B. McCain	0	0	0	0	0	1.2	0	0	0
12/28/2023	Research cases (by DCA) and their approaches to the impact rule in regard to breach of confidentiality. (3.3)	3.3	400	\$1,320.00	Daniel B. McCain	0	0	0	0	0	3.3	0	0	0
12/28/2023	Settlement emails from Ronda McNae. (0.15) Emails with Meredith Gussin and Mike Fitzgerald regarding same. (0.2)	0.25	550	\$137.50	Peter E Berlowe	0.25		0	0	0	0	0	0	0
12/27/2023	Review Reed and Gracey case and provide summary regarding potential exceptions to impact rule with regard to emotional distress claims. (1.2)	1.2	400	\$480.00	Daniel B. McCain	0	0	0	0	0	1.2	0	0	0
12/26/2023	Analyze Reese case in regard to the impact rule and its impact on intentional torts and negligence relating to emotional damages. (1.1)	1.1	400	\$440.00	Daniel B. McCain	0	0	0	0	0	1.1	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
12/23/2023	Prepare motion for extension of time to file reply in support of motion to bifurcate; (0.4) draft proposed order re same and correspondence with chambers; (0.2) conference with PEB to discuss status of case and pending matters (0.6)	1.2	500	\$600.00	Meredith J. Gussin	0	1.2	0	0	0	0	0	0	0
12/22/2023	Review Motion for Attorney's Fees and Response in Opposition to Motion to Bifurcate; (2.1) review correspondence from R. McNae (0.1)	2.2	500	\$1,100.00	Meredith J. Gussin	0	2.2	0	0	0	0	0	0	0
12/22/2023	Review William McNae's response in opposition to motion to bifurcate. (0.7) Review Will McNae's motion for attorneys fees filed today. (1.1) Emails between and amongst Meredith Gussin, Ronda McNae and myself regarding Ronda McNae's desire to reach a settlement. (0.3)	2.1	550	\$1,155.00	Peter E Berlowe	2.1	0	0	0	0	0	0	0	0
12/20/2023	Review correspondence from Ronda McNae, Stephanie Casey re settlement; (0.3) review ARAG Legal documents regarding coverage. (0.5)	0.8	500	\$400.00	Meredith J. Gussin	0	0.8	0	0	0	0	0	0	0
12/20/2023	Emails from and to Ronda McNae and Meredith Gussin. (0.25) Go over Ronda McNae insurance policy with Meredith Gussin to figure out if policy timed out or had max outlay, etc. (0.7) Review new non-monetary settlement terms being proposed by William McNae. (0.3)	1.25	550	\$687.50	Peter E Berlowe	1.25	0	0	0	0	0	0	0	0
12/19/2023	Revise fact section on Motion for Summary Judgment; (0.8) review pending trial deadlines and court imposed deadlines. (0.4)	1.8	500	\$900.00	Meredith J. Gussin	0	1.8	0	0	0	0	0	0	0
12/19/2023	Work with Meredith Gussin on pertinent facts to put in motion for summary judgment against Ronda McNae. (1.75) Emails with Meredith Gussin regarding asking Ronda McNae for updated insurance policy. (0.25)	2	550	\$1,100.00	Peter E Berlowe	2	0	0	0	0	0	0	0	0
12/18/2023	Review revised spreadsheet from S. Casey regarding disputed time entries; (0.9) various correspondence with R. McNae regarding settlement, status of case. (0.3)	1.2	500	\$600.00	Meredith J. Gussin	0	1.2	0	0	0	0	0	0	0
12/18/2023	Emails with Mike Fitzgerald regarding settlement possibilities with Will McNae. (0.3) Review Notice of Compliance filed by Ronda McNae. (0.1) Emails with Ronda McNae and Meredith Gussin regarding settlement. (0.2) Review revised fee an costs (0.7) spreadsheet from Will McNae's counsel. Discuss with Meredith Gussin. (0.3)	1.6	550	\$880.00	Peter E Berlowe	1.6	0	0	0	0	0	0	0	0
12/15/2023	Prepare for meet and confer with Stephanie Casey (0.5); Meet and confer with Stephanie Casey re Will McNae's Motion for Fees and Costs (1.0); Prepare correspondence to client regarding meet and confer and potential settlement discussion (0.6); correspondence with Ronda McNae re settlement (0.1); Legal research regarding collectibility of various fees and costs under 28 USC 1919 and 1920 (1.6)	3.8	500	\$1,900.00	Meredith J. Gussin	0	3.8	0	0	0	0	0	0	0
12/15/2023	Prepare to today's meet and confer on Will McNae's fees motion with Meredith Gussin. (2.1) Zoom conference with Meredith Gussin and Stephanie Casey regarding attorney's fees motion pursuant to Rule 7.3. (1.0)	3.1	550	\$1,705.00	Peter E Berlowe	3.1	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
12/14/2023	Legal research regarding fees and costs pursuant to Will McNae's Motion for Fees and Costs in advance of meeting to confer with Stephanie Casey; (3.9) correspondenc with R. McNae re potential settlement (0.3)	4.2	500	\$2,100.00	Meredith J. Gussin	0	4.2	0	0	0	0	0	0	0
12/13/2023	Draft Letter to AFW regarding objections to Motion for Fees; (1.25) Object to specific line item entries to fees motion; (0.8) review order on Motion to Withdraw. (0.15)	2.2	500	\$1,100.00	Meredith J. Gussin	0	2.2	0	0	0	0	0	0	0
12/13/2023	Review and revise letter to Ronda McNae counsel on fees claim. (0.9) Conference with Meredith Gussin regarding same. (0.3) Review line item fee and cost objections. (0.6) Review Order permitting Ronda McNae counsel to withdraw. (0.15)	1.9	550	\$1,045.00	Peter E Berlowe	1.9	0	0	0	0	0	0	0	0
12/12/2023	Research damages for breach of non-disparagement agreement against an individual. (1.0)	1	400	\$400.00	Daniel B. McCain	0	0	0	0	0	1	0	0	0
12/12/2023	Review Motion to Withdraw as Counsel for Ronda McNae; (0.15) discuss same with PEB. (0.25)	0.4	500	\$200.00	Meredith J. Gussin	0	0.4	0	0	0	0	0	0	0
12/11/2023	Research damages for breach of nondisparagement agreement regarding a person. (1.2)	1.2	400	\$480.00	Daniel B. McCain	0	0	0	0	0	1.2	0	0	0
12/11/2023	Draft Plaintiffs' Motion for Rule 54(d)(2)(C) determination and motion for extension of time to respond to Local Rule 7.3(a) requirements including legal research in support thereof. (7.1)	7.1	500	\$3,550.00	Meredith J. Gussin	0	7.1	0	0	0	0	0	0	0
12/11/2023	Review and revise letter to Stephanie Casey on Rule 7.3(b) issues. (1.3) Emails with Meredith Gussin regarding same. (0.3) Work with Meredith Gussin on motion regarding bifurcation of entitlement and amount of fees. (1.6) Review and revise objections to line item fee claims. (1.4)	4.6	550	\$2,530.00	Peter E Berlowe	4.6	0	0	0	0	0	0	0	0
12/10/2023	Work on Rule 54(d) Motion regarding entitlement to fees (4.0); Draft communication to S. Casey regarding objections to time entries (0.5); Review time entries and cite objections to fees and costs (1.2).	5.7	500	\$2,850.00	Meredith J. Gussin	0	5.7	0	0	0	0	0	0	0
12/7/2023	review W. McNae Motion for Fees including all associated claims to entitlement; (1.3) legal research regarding Rule 54 motion and strategize best practice to respond to fee motion; (2.5) review time entries by S. Casey and provide objections to same. (1.4)	5.2	500	\$2,600.00	Meredith J. Gussin	0	5.2	0	0	0	0	0	0	0
12/7/2023	Discuss with Peter Berlowe and Meredith Gussin attorneys' fees motion and bifurcation of same (as well as requesting additional time to go through all details); (0.2) research issues relating to bifurcation of fee claim. (0.2)	0.4	550	\$220.00	Eric N. Assouline	0	0	0.4	0	0	0	0	0	0
12/7/2023	Work with Meredith Gussin in developing response to Will McNae Motion for Fees. (1.6) Reviewing time records related to Will McNae and Ronda McNae Fee Motions.(1.2)	2.8	550	\$1,540.00	Peter E Berlowe	2.8	0	0	0	0	0	0	0	0
12/6/2023	Research damages for non-disparagement as against a person. (3.3)	3.3	400	\$1,320.00	Daniel B. McCain	0	0	0	0	0	3.3	0	0	0
12/6/2023	legal research regarding prevailing party, motion to dismiss without prejudice in opposition to fees motion. (3.4)	3.4	500	\$1,700.00	Meredith J. Gussin	0	3.4	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
12/6/2023	Review paperless order resetting briefing deadlines. (0.15) Emails with case team on caselaw research for breadth of damages obtainable for breach of non-disparagement agreement as opposed to defamation damages. (0.45) Emails with Stephanie Casey on Will McNae fees claim. (0.2) Emails with Mike Fitzgerald on settlement stances with Ronda and Will McNae. (0.3) Emails from opposing counsel regarding settlement and fees motions. (0.5) Call with Meredith Gussin on prevailing party research. (1.1)	2.7	550	\$1,485.00	Peter E Berlowe	2.7		0	0	0	0	0	0	0
12/5/2023	Review William McNae's fee motion; (0.5) legal research regarding prevailing party status; (0.85) zoom conference with PEB regarding case strategy; (0.7) draft and file Motion for Extension of Time to Reply to Motion to Dismiss per unopposed conferral. (0.35)	2.4	500	\$1,200.00	Meredith J. Gussin	0	2.4	0	0	0	0	0	0	0
12/5/2023	Zoom conference with Mike Fitzgerald on case status and strategy. (0.8) Reviewing William McNae motion for fees. (0.4) Zoom conference with Meredith Gussin regarding case strategy, including William McNae motion for fees. (1.1) Legal research on block billing. (0.5)	2.8	550	\$1,540.00	Peter E Berlowe	2.8		0	0	0	0	0	0	0
12/4/2023	Review Ronda McNae's Motion for Fees as to Yelany; (1.2) legal research regarding validity and enforceability as to Offer of Judgment. (1.0)	2.2	500	\$1,100.00	Meredith J. Gussin	0	2.2	0	0	0	0	0	0	0
12/4/2023	Review Ronda McNae fees motion against Yelany DeVarona. Emails with Meredith Gussin regarding same. (1.2) Call with Meredith Gussin regarding same. (0.5) Emails with opposing counsel and Meredith Gussin regarding Ronda McNae's request for extension of time. (0.2) Planning trial strategy. (0.4) Review case law on enforceability of offers of judgment. (0.3)	2.6	550	\$1,430.00	Peter E Berlowe	2.6		0	0	0	0	0	0	0
12/1/2023	Prepare findings of research regarding bad faith offers of judgment and dismissal without prejudice warranting fees. (2.7)	2.7	400	\$1,080.00	Daniel B. McCain	0	0	0	0	0	2.7	0	0	0
11/30/2023	Finalize Motion to Dismiss Counterclaim and Motion to Strike Affirmative Defenses; (4.3) Legal Research in Support thereof. (1.2)	5.5	500	\$2,750.00	Meredith J. Gussin	0	5.5	0	0	0	0	0	0	0
11/30/2023	Research whether jurisdiction or venue must be specifically pleaded in alleged compulsory counterclaim. (0.7)	0.7	400	\$280.00	Daniel B. McCain	0	0	0	0	0	0.7	0	0	0
11/30/2023	Email exchange w/ P. Berlowe and M. Gussin regarding litigation privilege supplemental counterclaim. (0.2)	0.2	550	\$110.00	Peter A. Koziol	0	0	0	0.2	0	0	0	0	0
11/30/2023	Continue working with Meredith Gussin on motion to dismiss counterclaim. (2.3) Legal research on various issues related to the motion. (1.1) Finalize motion to dismiss for Meredith Gussin to file. (1.2)	4.6	550	\$2,530.00	Peter E Berlowe	4.6		0	0	0	0	0	0	0
11/29/2023	Legal Research regarding motion for attorneys' fees; (1.6) revise and edit motion to dismiss. (3.1)	4.7	500	\$2,350.00	Meredith J. Gussin	0	4.7	0	0	0	0	0	0	0
11/29/2023	Research what constitutes a reasonable offer of judgment for attorney's fee motion. (1.9)	1.9	400	\$760.00	Daniel B. McCain	0	0	0	0	0	1.9	0	0	0
11/29/2023	Research regarding a dismissal without prejudice is considered a prevailing party. (2.0)	2	400	\$800.00	Daniel B. McCain	0	0	0	0	0	2	0	0	0
11/29/2023	Review and revise motion to dismiss counterclaim. (2.9) Zoom conference with Meredith Gussin regarding motion to dismiss counterclaim. (1.5)	4.4	550	\$2,420.00	Peter E Berlowe	4.4		0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
11/28/2023	Continue working on Motion to Dismiss Counterclaim and Motion to Strike Affirmative Defenses. (4.6)	4.6	500	\$2,300.00	Meredith J. Gussin	0	4.6	0	0	0	0	0	0	0
11/28/2023	Research as to what is considered a reasonable amount for an offer of judgment. (0.9)	0.9	400	\$360.00	Daniel B. McCain	0	0	0	0	0	0.9	0	0	0
11/28/2023	Receive and review attorney's fees motion and research how to attack attorney's fees motion for both Yelany and Michael from W.McNae. (2.5)	2.5	400	\$1,000.00	Daniel B. McCain	0	0	0	0	0	2.5	0	0	0
11/28/2023	Conference with Peter regarding status of case and how to approach attorney's fees motion/offer of judgment. (0.8)	0.8	400	\$320.00	Daniel B. McCain	0	0	0	0	0	0.8	0	0	0
11/28/2023	Conference with Daniel McCain about legal research needed for responding to Ronda McNae's and William McNae's respective motion for fees. (0.8) Emails to clients about motions for fees and settlement offers. (0.3) Review settlement offer from Will McNae's counsel. (0.2) Review and revise motion to dismiss counterclaim. (2.7) Emails with Meredith Gussin regarding same. (0.3)	4.3	550	\$2,365.00	Peter E Berlowe	4.3	0	0	0	0	0	0	0	0
11/27/2023	Work on Motion to Dismiss, Motion to Strike Affirmative Defenses; (2.5) review R. McNae Motion for Fees; (1.1) conference with PEB to discuss strategy; (0.5) legal research. (1.5)	5.6	500	\$2,800.00	Meredith J. Gussin	0	5.6	0	0	0	0	0	0	0
11/27/2023	Research case law for affirmative defenses to counterclaim. (1.8)	1.8	400	\$720.00	Daniel B. McCain	0	0	0	0	0	1.8	0	0	0
11/27/2023	Outline and draft affirmative defenses to counterclaim. (3.5)	3.5	400	\$1,400.00	Daniel B. McCain	0	0	0	0	0	3.5	0	0	0
11/27/2023	Emails to case team and conference with Daniel McCain regarding affirmative defenses to Ronda McNae Counterclaim. (1.1) Emails and zoom conference on motion to dismiss counterclaim. (1.9) Review and revise motion to dismiss counterclaim. (0.6) Cursory review of motions for attorney's fees provided by Ronda McNae and Will McNae. (0.5)	4.1	550	\$2,255.00	Peter E Berlowe	4.1	0	0	0	0	0	0	0	0
11/22/2023	Research law to refute affirmative defenses asserted in McNae's counterclaim. (1.3)	1.3	400	\$520.00	Daniel B. McCain	0	0	0	0	0	1.3	0	0	0
11/21/2023	Complete hard read/cite check of motion to dismiss, and conduct case law research for updated case law where applicable (shepardize). (2.6)	2.6	400	\$1,040.00	Daniel B. McCain	0	0	0	0	0	2.6	0	0	0
11/21/2023	Review and redline Counterclaim and Answer. (0.6)	0.6	400	\$240.00	Daniel B. McCain	0	0	0	0	0	0.6	0	0	0
11/21/2023	Review and redline MSJ. (0.7)	0.7	400	\$280.00	Daniel B. McCain	0	0	0	0	0	0.7	0	0	0
11/21/2023	Research means to refute Affirmative Defenses asserted by McNae in Answer. (0.7)	0.7	400	\$280.00	Daniel B. McCain	0	0	0	0	0	0.7	0	0	0
11/20/2023	Discuss status of case with Peter, receive assignments regarding revisions of Motion to Dismiss and arguments for striking affirmative defenses for Motion for Summary Judgment. (0.5)	0.5	400	\$200.00	Daniel B. McCain	0	0	0	0	0	0.5	0	0	0
11/20/2023	Hard-read, cite check and conduct research for updated case law for Motion to Dismiss. (2.8)	2.8	400	\$1,120.00	Daniel B. McCain	0	0	0	0	0	2.8	0	0	0
11/17/2023	Draft Motion to Dismiss Counterclaim; (2.2) Motion to Strike Affirmative Defenses. (1.1)	3.3	500	\$1,650.00	Meredith J. Gussin	0	3.3	0	0	0	0	0	0	0
11/17/2023	Emails with case team on case status and strategy. (0.35)	0.35	550	\$192.50	Peter E Berlowe	0.35	0	0	0	0	0	0	0	0
11/16/2023	Continue working on motion to dismiss counterclaim. (5.2)	5.2	500	\$2,600.00	Meredith J. Gussin	0	5.2	0	0	0	0	0	0	0
11/15/2023	Legal research and analysis for motion to dismiss counterclaim; (2.1) draft motion to dismiss counterclaim. (5.1)	7.2	500	\$3,600.00	Meredith J. Gussin	0	7.2	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
11/15/2023	Email exchange w/ M. Gussin regarding jury instructions regarding damages and special damages. (0.2)	0.2	550	\$110.00	Peter A. Koziol	0	0	0	0.2	0	0	0	0	0
11/15/2023	Emails with Meredith Gussin regarding case strategy and her call with Yelany De Verona today. (0.25)	0.25	550	\$137.50	Peter E Berlowe	0.25	0	0	0	0	0	0	0	0
11/14/2023	Email exchange w/ M. Gussin regarding pleading damages and claim for defamation. (0.2)	0.2	550	\$110.00	Peter A. Koziol	0	0	0	0.2	0	0	0	0	0
11/14/2023	Zoom conference with Meredith Gussin regarding Ronda McNae's Counterclaim for purposes of deciding whether to answer or move to dismiss. (1.1) Legal research on pleading damages under Iqbal/Twombly standard and whether counterclaim meets same. (0.6)	1.7	550	\$935.00	Peter E Berlowe	1.7	0	0	0	0	0	0	0	0
11/13/2023	Phone conference with PEB to discuss strategies, affirmative defenses, counterclaim (2.8)	2.8	500	\$1,400.00	Meredith J. Gussin	0	2.8	0	0	0	0	0	0	0
11/13/2023	Zoom conference with Meredith Gussin regarding summary judgment issues, trial issues and case strategy. (0.7)	0.7	550	\$385.00	Peter E Berlowe	0.7	0	0	0	0	0	0	0	0
11/9/2023	Review Answer, Affirmative Defenses and Counterclaim; (0.5) analysis of possible motion to to dismiss and strategy going forward. (1.6)	2.1	500	\$1,050.00	Meredith J. Gussin	0	2.1	0	0	0	0	0	0	0
11/9/2023	Emails with Meredith Gussin and Alaina Fotiu-Wojtowicz regarding joint statement of undisputed facts for motion for summary judgment. (0.3) Emails with Meredith Gussin on other case status issues. (0.2) Review Answer and Affirmative Defenses and Counterclaim. (1.0) Cursory discussion with Meredith Gussin Regarding same. (1.0)	2.5	550	\$1,375.00	Peter E Berlowe	2.5	0	0	0	0	0	0	0	0
11/8/2023	Conference with Meredith Gussin on joint statement of undisputed fact issues and other case strategy concerns. (0.6)	0.6	550	\$330.00	Peter E Berlowe	0.6	0	0	0	0	0	0	0	0
11/7/2023	Conference with Meredith Gussin regarding summary judgment joint statement of undisputed facts. (0.4) Review and revise draft of same. (0.3)	0.7	550	\$385.00	Peter E Berlowe	0.7	0	0	0	0	0	0	0	0
11/6/2023	Draft Response in Opposition to R. McNae's Motion to File Surreply; (1.4) review deposition transcript of R. McNae; (1.4) legal research regarding legality of contracting parties in Florida for motion for summary judgment. (0.6)	3.4	500	\$1,700.00	Meredith J. Gussin	0	3.4	0	0	0	0	0	0	0
11/3/2023	Conference with Meredith Gussin on whether there are any appeal issues that needed to be raised now versus when the case is completed as a whole. (0.75)	0.75	550	\$412.50	Peter E Berlowe	0.75	0	0	0	0	0	0	0	0
11/2/2023	Finalize state court complaint; (1.1) prepare summons; (0.3) prepare civil cover sheet; (0.3) prepare all exhibits for filing; (0.4) correspondence with counsel for Will McNae. (0.3)	2.4	500	\$1,200.00	Meredith J. Gussin	0	2.4	0	0	0	0	0	0	0
11/2/2023	Emails from and to Will McNae's counsel regarding filing motion for judgment as to Will McNae. (0.1) Discuss same with Meredith Gussin. (0.15)	0.25	550	\$137.50	Peter E Berlowe	0.25	0	0	0	0	0	0	0	0
11/1/2023	Conference call with clients, PEB to discuss case strategy; (0.5) draft revised state court complaint against Will McNae. (2.6)	3.1	500	\$1,550.00	Meredith J. Gussin	0	3.1	0	0	0	0	0	0	0
10/31/2023	Legal research regarding enforceability of contracts under public policy arguments, duress, etc.; (1.6) first draft of state court complaint against Will McNae for breach of contract. (1.4)	3	500	\$1,500.00	Meredith J. Gussin	0	3	0	0	0	0	0	0	0
10/31/2023	Emails with case team and clients regarding Order on motion for leave to amend. (0.25)	0.25	550	\$137.50	Peter E Berlowe	0.25	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
10/30/2023	Review Court order; (0.1) review pending motions to determine mootness; (0.3) legal research in support of MSJ. (1.2)	1.6	500	\$800.00	Meredith J. Gussin	0	1.6	0	0	0	0	0	0	0
10/30/2023	Review Order on motion for leave to amend. (0.1) Discuss with Meredith Gussin. (0.65)	0.75	550	\$412.50	Peter E Berlowe	0.75	0	0	0	0	0	0	0	0
10/26/2023	Finalize filing for Motion for Leave to amend. (1.3)	1.3	500	\$650.00	Meredith J. Gussin	0	1.3	0	0	0	0	0	0	0
10/26/2023	Review and revise motion for leave to amend. (1.25) Legal research regarding punitive damages in contracts. (0.3) Review Order on motion for extension of time. (0.1) Review Order extending pretrial deadlines. (0.1)	1.75	550	\$962.50	Peter E Berlowe	1.75	0	0	0	0	0	0	0	0
10/25/2023	Revise, edit and amend Motion for Leave to amend; (1.2) revise and edit issues in second amended complaint; (0.8) correspondence with opposing counsel regarding upcoming deadlines and proposed motion with court regarding pretrial deadlines. (0.3)	2.3	500	\$1,150.00	Meredith J. Gussin	0	2.3	0	0	0	0	0	0	0
10/25/2023	Review and revise motion for leave to amend. (0.7) Call with Meredith Gussin regarding same. (0.2) Emails with Meredith Gussin regarding same and case strategy. (0.2)	1.1	550	\$605.00	Peter E Berlowe	1.1	0	0	0	0	0	0	0	0
10/24/2023	Review Court's Amended Order on Motion to Dismiss; (0.2) draft renewed Motion for Leave to amend; (1.7) review issues raised in response brief. (0.6)	2.5	500	\$1,250.00	Meredith J. Gussin	0	2.5	0	0	0	0	0	0	0
10/24/2023	Review amended Order on motion to dismiss. Determine differences from last order. (0.8) Calls and emails with Meredith Gussin and Eric Assouline regarding same. (0.6)	1.4	550	\$770.00	Peter E Berlowe	1.4	0	0	0	0	0	0	0	0
10/23/2023	Work on Motion for Summary Judgment. (1.3)	1.3	500	\$650.00	Meredith J. Gussin	0	1.3	0	0	0	0	0	0	0
10/20/2023	Review Joint Motion for Extension of Time; (0.1) meet and confer with opposing counsel re pending disputes. (0.5)	0.6	500	\$300.00	Meredith J. Gussin	0	0.6	0	0	0	0	0	0	0
10/20/2023	Review and revise joint motion to extend pretrial deadlines. (0.3) Review motion to file surreply. (0.2) Calls with Meredith Gussin on case strategy. (0.4)	0.9	550	\$495.00	Peter E Berlowe	0.9	0	0	0	0	0	0	0	0
10/19/2023	Emails with Meredith Gussin and Alaina Fotiu-Wojtowicz in conferral regarding surreply brief. (0.4) Call with Meredith Gussin regarding same. (0.4)	0.8	550	\$440.00	Peter E Berlowe	0.8	0	0	0	0	0	0	0	0
10/18/2023	Finalize Reply Brief in Support of Motion to Strike Untimely Amended Witness Lists; (0.7) prepare attachments; (0.3) file same with court. (0.1)	1.1	500	\$550.00	Meredith J. Gussin	0	1.1	0	0	0	0	0	0	0
10/18/2023	Emails with case team and opposing counsel regarding McNaes desire to extend case deadlines given how long court is taking to rule on motions. (0.4) Review and revise reply brief on motion to strike witness list. (1.1) Emails with opposing counsel and Meredith Gussin regarding McNaes wanting to file a surreply brief. (0.3)	1.8	550	\$990.00	Peter E Berlowe	1.8	0	0	0	0	0	0	0	0
10/17/2023	Draft reply in support of Motion to Strike Untimely Amended Witness Lists. (4.4)	4.4	500	\$2,200.00	Meredith J. Gussin	0	4.4	0	0	0	0	0	0	0
10/17/2023	Emails from and to Elaina Fotiu-Wojtowicz regarding scheduling of pretrial deadlines. (0.2) Discuss same with Meredith Gussin. (0.2) Review and revise reply brief regarding motion to strike untimely witness list. (0.85)	1.25	550	\$687.50	Peter E Berlowe	1.25	0	0	0	0	0	0	0	0
10/16/2023	Emails with mediator Engel's firm regarding payment of their invoice. (0.1)	0.1	550	\$55.00	Peter E Berlowe	0.1	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
10/11/2023	Reveiw R. McNae Response to Motion to Strike Untimely Amended Witness List and all exhibits thereto; (0.3) analysis of response and discussion of same with PEB; (0.9) review W. McNae Response brief to same. (0.4)	1.6	500	\$800.00	Meredith J. Gussin	0	1.6	0	0	0	0	0	0	0
10/11/2023	Review response from McNae regarding motion to strike untimely witness list. (0.2) Discuss same with Meredith Gussin and address issues for a reply. (0.4)	0.6	550	\$330.00	Peter E Berlowe	0.6	0	0	0	0	0	0	0	0
10/9/2023	Legal research in support of motion for summary judgment. (1.0)	1	500	\$500.00	Meredith J. Gussin	0	1	0	0	0	0	0	0	0
10/5/2023	Analysis of status of case; (0.4) review various documents and analysis of issues. (0.6)	1	500	\$500.00	Meredith J. Gussin	0	1	0	0	0	0	0	0	0
10/5/2023	Emails with Meredith Gussin regarding case strategy and asserting amended complaint. (0.1) Call with Meredith Gussin regarding same. (0.2)	0.3	550	\$165.00	Peter E Berlowe	0.3	0	0	0	0	0	0	0	0
10/3/2023	Emails with Meredith Gussin regarding deposition errata sheet from expert witness. (0.15)	0.15	550	\$82.50	Peter E Berlowe	0.15	0	0	0	0	0	0	0	0
9/28/2023	Emails with Meredith Gussin regarding case strategy and status, as well as Max Meyers being informed his trust account information was redacted from the record. (0.1)	0.1	550	\$55.00	Peter E Berlowe	0.1	0	0	0	0	0	0	0	0
9/27/2023	Finalize and final Motion to Strike Untimely Amended Witness List. (0.3)	0.3	500	\$150.00	Meredith J. Gussin	0	0.3	0	0	0	0	0	0	0
9/27/2023	Review, revise and finalize motion to strike witness list. (0.35) Discuss with Meredith Gussin. (0.15) Review Orders granting leave to redact exhibits referencing Max Meyer's trust account numbers. (0.1)	0.6	550	\$330.00	Peter E Berlowe	0.6	0	0	0	0	0	0	0	0
9/26/2023	Review and edit Motion to Strike Amended Witness List as Untimely. (0.1)	1	500	\$500.00	Meredith J. Gussin	0	1	0	0	0	0	0	0	0
9/22/2023	: Conference call with Meredith Gussin regarding case status and strategy. (0.3)	0.3	550	\$165.00	Peter E Berlowe	0.3	0	0	0	0	0	0	0	0
9/21/2023	Call with Meredith Gussin regarding joint statement of facts for motion for summary judgment and other case issues. (0.25)	0.25	550	\$137.50	Peter E Berlowe	0.25	0	0	0	0	0	0	0	0
9/20/2023	Revise and edit Motion to Strike Untimely Amended Witness List; (0.95) discuss case strategy including summary judgment issues. (0.25)	1.2	500	\$600.00	Meredith J. Gussin	0	1.2	0	0	0	0	0	0	0
9/20/2023	Call and emails with Meredith Gussin on motion to strike tardy witness list. (0.25)	0.25	550	\$137.50	Peter E Berlowe	0.25	0	0	0	0	0	0	0	0
9/19/2023	Working with Meredith Gussin on case strategy. (0.25)	0.25	550	\$137.50	Peter E Berlowe	0.25	0	0	0	0	0	0	0	0
9/15/2023	Email to Mike Fitzgerald regarding Sheri Fiske invoice. (0.05)	0.05	550	\$27.50	Peter E Berlowe	0.05	0	0	0	0	0	0	0	0
9/14/2023	Draft Motion for Leave to Refile Redacted Exhibits as to Financial Information; (0.6) Work on Motion for Summary Judgment. (2.6)	3.2	500	\$1,600.00	Meredith J. Gussin	0	3.2	0	0	0	0	0	0	0
9/14/2023	Emails and calls with Meredith Gussin regarding motion to redact exhibits, and motion for summary judgment. (0.45) Review and revise motion to redact exhibits. (0.3)	0.75	550	\$412.50	Peter E Berlowe	0.75	0	0	0	0	0	0	0	0
9/13/2023	Attend Mediation; (5.2) draft Motion for Leave to File Redacted Exhibits to Complaint. (2.3)	7.5	500	\$3,750.00	Meredith J. Gussin	0	7.5	0	0	0	0	0	0	0
9/13/2023	Prepare for and attend mediation with Meredith Gussin and clients. (5.8) Conferences with clients during and after mediation. (0.4) Call with Meredith Gussin regarding motion to redact Max Meyer's account information form Complaint exhibits. (0.4)	6.6	550	\$3,630.00	Peter E Berlowe	6.6	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
9/12/2023	Telephone call with Mediator, PEB and clients; (0.3) prepare opening statements in advance of Mediation. (1.1)	1.4	500	\$700.00	Meredith J. Gussin	0	1.4	0	0	0	0	0	0	0
9/12/2023	Emails with Mediator Clasby and Meredith Gussin. (0.2) Follow up call with Mediator on upcoming mediation and how to motivate Ronda McNae to settle. (0.3) Zoom conference with Meredith Gussin, Mike Fitzgerald and Yelany Devarona regarding mediation and opening statement. (0.5) Discuss opening statement with Meredith Gussin. (0.2)	1.2	550	\$660.00	Peter E Berlowe	1.2	0	0	0	0	0	0	0	0
9/11/2023	Telephone call with Mediator. (1.3)	1.3	500	\$650.00	Meredith J. Gussin	0	1.3	0	0	0	0	0	0	0
9/11/2023	Emails with Mediator Clasby and Meredith Gussin. (0.1) Telephone conference with Mediator and Meredith Gussin regarding case and how mediation can proceed. (1.2)	1.3	550	\$715.00	Peter E Berlowe	1.3	0	0	0	0	0	0	0	0
9/10/2023	Emails with Kim Fromme regarding errata sheet. Preparing for mediation. (0.25)	0.25	550	\$137.50	Peter E Berlowe	0.25	0	0	0	0	0	0	0	0
9/9/2023	Emails with Kim Fromme regarding her errata sheet. Review errata sheet. (0.25)	0.25	550	\$137.50	Peter E Berlowe	0.25	0	0	0	0	0	0	0	0
9/8/2023	Emails with Meredith Gussin regarding Max Meyers account issue. (0.25)	0.25	550	\$137.50	Peter E Berlowe	0.25	0	0	0	0	0	0	0	0
9/8/2023	Emails with mediator, mediator's office and Meredith Gussin regarding mediation issues. (0.3)	0.3	550	\$165.00	Peter E Berlowe	0.3	0	0	0	0	0	0	0	0
9/7/2023	Work on Mediation Statement; (2.4) review documentation in advance of same; (0.4) analysis of Motion to Strike Witness List. (0.7)	3.5	500	\$1,750.00	Meredith J. Gussin	0	3.5	0	0	0	0	0	0	0
9/7/2023	Work with Meredith Gussin on mediation statement. (1.0) Work with Meredith Gussin on Motion to Strike late witness list. (0.25) Legal research regarding appeal issues and possibility of separate defamation claim in state court. (0.5)	1.75	550	\$962.50	Peter E Berlowe	1.75	0	0	0	0	0	0	0	0
9/6/2023	Prepare Mediation Statement; (2.1) review documents; (0.8) correspondence with Max Meyers, Esq. (0.3)	3.2	500	\$1,600.00	Meredith J. Gussin	0	3.2	0	0	0	0	0	0	0
9/6/2023	Review of insurance policy provided by defendants and review for understanding exposure on attorney fee standpoint for possible counterclaims and provide analysis to MG and PEB to use in mediation strategy. (0.5)	0.5	400	\$200.00	Francisco J. Barreto	0	0	0	0	0.5	0	0	0	0
9/6/2023	Work with Meredith Gussin on mediation statement. (0.9) Call with Meredith Gussin regarding Max Meyer's trust account information filed in the Court. (0.2) Emails with case team on mediation strategy and analyzing McNae insurance policy on any motivating factors it could yield for mediation. (0.2)	1.3	550	\$715.00	Peter E Berlowe	1.3	0	0	0	0	0	0	0	0
9/1/2023	Legal research on whether Order on motion to dismiss was a final appealable order as pertains to Yelany De Varona. (1.5) Calls emails with Meredith Gussin regarding same. (0.3)	1.8	550	\$990.00	Peter E Berlowe	1.8	0	0	0	0	0	0	0	0
8/31/2023	Emails with Meredith Gussin regarding whether we need to file a notice of appeal concerning Order dismissing as to Yelany. (0.3) Legal research regarding same. (0.45)	0.75	550	\$412.50	Peter E Berlowe	0.75	0	0	0	0	0	0	0	0
8/24/2023	Emails with Mike Fitzgerald regarding Persefoni documents. (0.3) Emails with Mike Fitzgerald regarding discovery status. Emails with Meredith Gussin regarding Max Meyers account issue. (0.5)	1.1	550	\$605.00	Peter E Berlowe	1.1	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
8/22/2023	Emails with Meredith Gussin regarding issues with Expert Fiske. (0.3) Work with Meredith Gussin in finalizing reply in support of motion for leave to amend. (0.5)	0.8	550	\$440.00	Peter E Berlowe	0.8	0	0	0	0	0	0	0	0
8/21/2023	Finalize Reply Brief in Response to Motion for Leave to Amend Complaint. (1.1)	1.1	500	\$550.00	Meredith J. Gussin	0	1.1	0	0	0	0	0	0	0
8/21/2023	Review of draft response reply to McNae response to motion for leave to amend complaint and provide comment and edits. (0.4)	0.4	400	\$160.00	Francisco J. Barreto	0	0	0	0	0.4	0	0	0	0
8/21/2023	Review and revise reply in support of our motion for leave to amend. (0.9) Emails and call with Meredith Gussin regarding same. (0.85)	1.75	550	\$962.50	Peter E Berlowe	1.75	0	0	0	0	0	0	0	0
8/21/2023	Emails with Meredith Gussin regarding issues with Expert Fiske. (0.2) Work with Meredith Gussin in finalizing reply in support of motion for leave to amend. (0.6)	0.8	550	\$440.00	Peter E Berlowe	0.8	0	0	0	0	0	0	0	0
8/20/2023	Draft reply in support of motion for leave to amend. (1.5)	1.5	500	\$750.00	Meredith J. Gussin	0	1.5	0	0	0	0	0	0	0
8/18/2023	Review Court Order on Motion to Dismiss; (0.2) Review and Analysis of Defendants' Response Brief in Opposition to Motion for Leave to Amend; (0.8) Review Plaintiffs' brief in opposition of Motion to Dismiss; (0.6) legal research re same; (2.2) begin drafting Reply Brief in Support of Motion for Leave to Amend. (2.6)	6.4	500	\$3,200.00	Meredith J. Gussin	0	6.4	0	0	0	0	0	0	0
8/18/2023	Working with case team on amended complaint and motion for leave. (1.1)	1.1	550	\$605.00	Peter E Berlowe	1.1	0	0	0	0	0	0	0	0
8/17/2023	Planning out potential summary judgment motion and possible Daubert motions. (0.65)	0.65	550	\$357.50	Peter E Berlowe	0.65	0	0	0	0	0	0	0	0
8/16/2023	Planning out potential summary judgment motion. (0.7)	0.7	550	\$385.00	Peter E Berlowe	0.7	0	0	0	0	0	0	0	0
8/15/2023	Review Court order on Motion for Extension of Time; (0.1) review Response to Motion for Leave to Amend Complaint. (0.9)	1	500	\$500.00	Meredith J. Gussin	0	1	0	0	0	0	0	0	0
8/15/2023	Review of paperless order and Response to Motion for Leave, and discuss via email with partners. (0.2)	0.2	400	\$80.00	Francisco J. Barreto	0	0	0	0	0.2	0	0	0	0
8/15/2023	Review response in opposition to motion for leave to amend. (2.2) Review Order changing certain case deadlines until after it reviews the motion for leave to amend. (0.1) Review Order on deadlines for Daubert motions and summary judgment motions. (0.1) Emails with case team on filing a reply to McNae's response in opposition for leave to amend. (0.4)	2.8	550	\$1,540.00	Peter E Berlowe	2.8	0	0	0	0	0	0	0	0
8/14/2023	Meet and Confer with Opposing counsel regarding pending Motion to Strike Amended Witness List; (0.2) Motion to Strike Sheri Fiske and Motion for Summary Judgment; (0.2) follow up with PEB; (0.2) draft Joint Statement of Undisputed Facts. (1.6)	2.2	500	\$1,100.00	Meredith J. Gussin	0	2.2	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
8/14/2023	Emails with opposing counsel regarding having a meet and confer regarding Ronda McNae filing a Daubert motion as to Expert Fiske. (0.2) Review documents produced by Persefoni. (0.6) Forward same to Mike Fitzgerald. (0.2) Emails and calls with Meredith Gussin regarding filing motion for summary judgment. (0.5) Research Ronda McNae Stipulations for purposes of moving for summary judgment. (0.4) Forwarding findings to Meredith Gussin. (0.1) Review proposed joint statement of stipulated facts for sending to opposing counsel. (1.1)	3.1	550	\$1,705.00	Peter E Berlowe	3.1	0	0	0	0	0	0	0	0
8/11/2023	Review motion for extension of time filed by McNaes. (0.1) Conference with Meredith Gussin on various case issues. (0.5)	0.6	550	\$330.00	Peter E Berlowe	0.6	0	0	0	0	0	0	0	0
8/10/2023	Finalize and File Motion for Leave to Amend and Second Amended Complaint; (0.75) edit Motion to Strike Amended Witness Lists. (0.25)	1	500	\$500.00	Meredith J. Gussin	0	1	0	0	0	0	0	0	0
8/10/2023	Creating redline of first amended complaint with second amended complaint. (0.4) Emails with opposing counsel regarding same and them wanting to extend case deadlines. (0.25) Work with Meredith Gussin on finalizing motion for leave to amend and second amended complaint. (2.05)	2.7	550	\$1,485.00	Peter E Berlowe	2.7	0	0	0	0	0	0	0	0
8/9/2023	Zoom conference with clients re case strategy; (0.75) review, edit and revise Motion for Leave to Amend and Second Amended Complaint; (1.7) prepare correspondence to opposing counsel re same as meet and confer obligation. (0.25)	2.7	500	\$1,350.00	Meredith J. Gussin	0	2.7	0	0	0	0	0	0	0
8/9/2023	Drafting and revising second amended complaint and motion for leave to amend. (1.25) Zoom conference with Meredith Gussin regarding various motions and case issues. (0.75) Zoom conference with Mike Fitzgerald, Yelany De Varona and Meredith Gussin regarding status update and various motions we will be filing. (0.8)	2.8	550	\$1,540.00	Peter E Berlowe	2.8	0	0	0	0	0	0	0	0
8/8/2023	Edit Second Amended Complaint; (3.2) draft Motion to Strike Amended Witness Lists. (0.6)	3.8	500	\$1,900.00	Meredith J. Gussin	0	3.8	0	0	0	0	0	0	0
8/8/2023	Drafting and revising second amended complaint and motion for leave to amend. (2.3)	2.3	550	\$1,265.00	Peter E Berlowe	2.3	0	0	0	0	0	0	0	0
8/7/2023	Draft, edit and research Motion for Leave to Amend Complaint; (2.9)work on revisions to Second Amended Complaint. (1.5)	4.4	500	\$2,200.00	Meredith J. Gussin	0	4.4	0	0	0	0	0	0	0
8/7/2023	Conduct necessary research on issues of consortium being contracted away by a spouse, whether consortium can stem from ED damages from breach of settlement agreement, and extent of NIED physical injury requirement and if it is viable to Yelany. (0.8)	0.8	400	\$320.00	Francisco J. Barreto	0	0	0	0	0.8	0	0	0	0
8/7/2023	Conduct strategy call with PEB to discuss NIED viability post research, discuss NIED consequence and proof of elements, and discuss best course of action on any appeal of MTD Order or Motion to Amend. (0.8)	0.8	400	\$320.00	Francisco J. Barreto	0	0	0	0	0.8	0	0	0	0
8/7/2023	Emails with case team on various research results related to post Order of Dismissal issues. (0.3) Legal research regarding same. (1.6) Calls with Meredith Gussin on seeking leave to amend. (1.2) Emails with clients on setting up meeting. (0.2)	3.3	550	\$1,815.00	Peter E Berlowe	3.3	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
8/6/2023	Work on motion for leave to amend complaint; (1.1) legal research and analysis re same. (1.1)	2.2	500	\$1,100.00	Meredith J. Gussin	0	2.2	0	0	0	0	0	0	0
8/5/2023	Prepare final discovery production; (1.3) work on Motion for Leave to Amend Complaint. (1.1)	2.4	500	\$1,200.00	Meredith J. Gussin	0	2.4	0	0	0	0	0	0	0
8/4/2023	Emails with opposing counsel regarding deposition fees for Experts Ho and Hopper. (0.4) Working with case team in dealing with the Order on Motion to Dismiss, and possible amendment. (2.8)	3.2	550	\$1,760.00	Peter E Berlowe	3.2	0	0	0	0	0	0	0	0
8/3/2023	Analysis of Court order; (0.2)work on amending complaint, motion to strike, assess strategy re summary judgment, etc. (2.8)	3	500	\$1,500.00	Meredith J. Gussin	0	3	0	0	0	0	0	0	0
8/3/2023	Conduct strategy conference with PEB and MG to discuss Order Granting in Part and Denying in Part, Defendant's motion to dismiss, and discuss Proposals for Settlement, Leave to Amend, alternative counts, and related issues moving forward to appropriately respond. (2.8)	2.6	400	\$1,040.00	Francisco J. Barreto	0	0	0	0	2.6	0	0	0	0
8/3/2023	Review Judge Martinez's Order in full detail for purposes of preparing to discuss proposed strategies in response to the same with MG and PEB. (0.4)	0.4	400	\$160.00	Francisco J. Barreto	0	0	0	0	0.4	0	0	0	0
8/3/2023	Draft email to clients regarding Order on motion to dismiss. (0.2) Zoom conference with case team regarding Order of Dismissal and strategy for amendment options. (2.8) Legal research regarding same. (0.7) Email with opposing counsel regarding Defendants wanting to seek clarification of Order of Dismissal. Emails with opposing counsel on Judy Ho deposition exhibits. (0.2)	4.2	550	\$2,310.00	Peter E Berlowe	4.2	0	0	0	0	0	0	0	0
8/2/2023	Strategy conference with Meredith Gussin, Peter Berlowe, and also Peter Koziol regarding summary judgment, striking witnesses, striking experts, and handling issues with delayed order and counterclaim ability. (2.2)	2.2	400	\$880.00	Francisco J. Barreto	0	0	0	0	2.2	0	0	0	0
8/2/2023	Strategy call with PEB and FJB; (2.2) review court order on Motion to Dismiss. (0.6)	2.8	500	\$1,400.00	Meredith J. Gussin	0	2.8	0	0	0	0	0	0	0
8/2/2023	Telephonic conference w/ P. Berlowe regarding potential counterclaim and Court's delay in ruling upon Motion to Dismiss; (0.6) Research regarding counterclaim and tolling of statute of limitations. (0.3)	0.9	550	\$495.00	Peter A. Koziol	0	0	0	0.9	0	0	0	0	0
8/2/2023	Emails with case team on case strategy. (0.3) Zoom conferences with Meredith Gussin and Frank Barreto regarding case strategy and various possible motions. (2.2) Review Order granting motion to dismiss. (0.2) Disburse same amongst case team. (0.1) Emails with case team regarding same. Calls with Meredith Gussin regarding same. (0.9)	3.7	550	\$2,035.00	Peter E Berlowe	3.7	0	0	0	0	0	0	0	0
8/1/2023	Emails with Expert Kim Fromme on Hopper Deposition. (0.25) Emails with opposing counsel regarding payment of opposing experts deposition fees. (0.25) Researching issues for potential summary judgment motion. (1.1)	1.6	550	\$880.00	Peter E Berlowe	1.6	0	0	0	0	0	0	0	0
7/28/2023	Prepare for and attend deposition of Judy Ho. (4.8)	4.8	500	\$2,400.00	Meredith J. Gussin	0	4.8	0	0	0	0	0	0	0
7/27/2023	Attend deposition of Dr. Jim Hopper (4 .0); prepare for deposition of Dr. Judy Ho (3.0)	7	500	\$3,500.00	Meredith J. Gussin	0	7	0	0	0	0	0	0	0
7/27/2023	Prepare for and take deposition of James Hopper. (4.0) Conference with Meredith Gussin regarding same. (0.4)	4.4	550	\$2,420.00	Peter E Berlowe	4.4	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
7/26/2023	Telephone conference with Dr. Michael DiTomaso to prepare for the deposition of Dr. Judy Ho; (0.6) prepare for and take deposition of Abigail Leonard; (2.8) review additional witness lists filed by Defendants; (0.2) case strategy and analysis. (0.6)	4.2	500	\$2,100.00	Meredith J. Gussin	0	4.2	0	0	0	0	0	0	0
7/26/2023	Legal research pertaining to expert witnesses having to relate opinions to the facts of the case, and not merely give ipse dixit opinions leading to misleading conclusions, and preparation of findings therein. (5.0)	5	400	\$2,000.00	Daniel B. McCain	0	0	0	0	0	5	0	0	0
7/26/2023	Prepare for deposition of expert James Hopper. (6.7) Emails with opposing counsel Instagram discovery dispute. (0.25) Emails with opposing counsel on final date for mediation. (0.1) Emails with case team on deposition of Abigail Leonard. (0.15) Review Rhonda McNae's and Will McNae's Amended Witness List and Supplemental Initial Disclosures. (0.2) Conference with Daniel McCain regarding legal research for Daubert challenge to James Hopper. (0.4)	7.8	550	\$4,290.00	Peter E Berlowe	7.8	0	0	0	0	0	0	0	0
7/25/2023	Telephone call with Dr. DiTomaso in advance of Judy Ho deposition. (1.5)	1.5	500	\$750.00	Meredith J. Gussin	0	1.5	0	0	0	0	0	0	0
7/25/2023	Communicate with Peter B. regarding posture of case in order to familiarize self with case and contribute to legal research. (1.0)	1	400	\$400.00	Daniel B. McCain	0	0	0	0	0	1	0	0	0
7/25/2023	Prepare for deposition of expert James Hopper. (1.1) Zoom conference with Kim Fromme regarding same. (2.8) Working with counsel and clients on scheduling mediation. (0.3)	4.2	550	\$2,310.00	Peter E Berlowe	4.2	0	0	0	0	0	0	0	0
7/24/2023	Prepare supplemental response to Second Joint Request for Production of Documents: (1.6) prepare response to Fourth Joint Request for Production of Documents; Prepare response to Request for Admissions: prepare documents responsive to same. (1.4)	3	500	\$1,500.00	Meredith J. Gussin	0	3	0	0	0	0	0	0	0
7/24/2023	Preparing for James Hopper deposition. (2.5) Emails with case team on case issues and strategy. (0.3) Email with Kim Fromme regarding Jim Hopper deposition. (0.2) Emails with case team and clients on scheduling mediation. (0.2) Telephone conference with Peter Koziol. (0.1)	5.3	550	\$2,915.00	Peter E Berlowe	5.3	0	0	0	0	0	0	0	0
7/24/2023	Telephonic conference w/ P. Berlowe regarding court procedures. (0.1 NO CHARGE)	0	0	\$0.00	Peter A. Koziol	0	0	0	0	0	0	0	0	0
7/23/2023	Preparing for James Hopper Deposition. (4.8)	4.8	550	\$2,640.00	Peter E Berlowe	4.8	0	0	0	0	0	0	0	0
7/22/2023	Preparing for James Hopper Deposition. (2.1)	2.1	550	\$1,155.00	Peter E Berlowe	2.1	0	0	0	0	0	0	0	0
7/21/2023	Finish review of Yelany text messages and production of same; (1.6) response to numerous discovery emails; (0.4) prepare supplemental response to Yelany request for production; (1.2) review supplemental response to Joint RFP; (0.7) review correspondence; (0.6) review Judy Ho supplemental report. (1.0)	5.5	500	\$2,750.00	Meredith J. Gussin	0	5.5	0	0	0	0	0	0	0
7/21/2023	Emails with Meredith Gussin regarding pending discovery disputes with opposing parties. (0.3) Preparing for James Hopper deposition. (3.9) Emails with Meredith Gussin on Requests for Admission. (0.3) Attempting to schedule mediation with Mediator Sarah Clasby Engel. (0.2)	4.7	550	\$2,585.00	Peter E Berlowe	4.7	0	0	0	0	0	0	0	0
7/20/2023	Deposition of Dr. Brock Weedman; review and analysis of case strategy. (5.8)	5.8	500	\$2,900.00	Meredith J. Gussin	0	5.8	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
7/20/2023	Review Weedman deposition exhibits sent before today's deposition. (0.2) Attend the deposition of Dr. Brock Weedman. (5.8) Preparing for James Hopper Deposition. (0.2)	6.2	550	\$3,410.00	Peter E Berlowe	6.2	0	0	0	0	0	0	0	0
7/19/2023	Attend deposition of James Bhaskar (5.5); prepare deposition outline for Dr. Brock Weedman (3.0).	8.5	500	\$4,250.00	Meredith J. Gussin	0	8.5	0	0	0	0	0	0	0
7/19/2023	Prepare for and take the deposition of Dr. James Bhaskar. (6.1) Emails with Jenny Martinez and Stephanie Casey regarding privilege issues. (0.3) Preparing for James Hopper deposition. (0.9)	7.3	550	\$4,015.00	Peter E Berlowe	7.3	0	0	0	0	0	0	0	0
7/18/2023	Prepare for and attend the deposition of Sarah Dellinger; (1.6) conference with PEB in advance of deposition of Dr. James Bhaskar. (4.4)	6	500	\$3,000.00	Meredith J. Gussin	0	6	0	0	0	0	0	0	0
7/18/2023	Attend deposition of Sarah Dellinger. (1.4) Conference with Meredith Gussin regarding deposition of Sarah Dellinger. (0.2) Preparing for Deposition of Dr. Bhaskar. (4.8) Emails with case team regarding case issues and strategy. (0.4)	6.8	550	\$3,740.00	Peter E Berlowe	6.8	0	0	0	0	0	0	0	0
7/17/2023	Review James Bhaskar document; (2.2) prepare outline for deposition of James Bhaskar. (3.4)	4.6	500	\$2,300.00	Meredith J. Gussin	0	4.6	0	0	0	0	0	0	0
7/17/2023	Preparing for Bhaskar Deposition. (0.4) Preparing for Hopper Deposition. (4.9) Conference with Meredith Gussin on Dellinger deposition. (0.5) Emails with case team regarding case issues and strategy. (0.4)	6.2	550	\$3,410.00	Peter E Berlowe	6.2	0	0	0	0	0	0	0	0
7/16/2023	Review Sarah Dellinger clinical notes and progress reports in preparation for deposition of same; (2.9) prepare deposition outlines of Sarah Dellinger and Brock Weedman. (1.2)	4.1	500	\$2,050.00	Meredith J. Gussin	0	4.1	0	0	0	0	0	0	0
7/14/2023	Review report and rebuttal report of Kim Fromme; (0.5) attend deposition of Kim Fromme; (2.8) prepare for deposition of Abigail Leonard (no show); (0.4) attempt to reschedule deposition of Abigail Leonard; (0.3) review of Sarah Dellinger documents in advance of deposition of same. (4.0)	8	500	\$4,000.00	Meredith J. Gussin	0	8	0	0	0	0	0	0	0
7/14/2023	Attend deposition of Kim Fromme. (2.8) Attend deposition of Abigail Leonard, who failed to show. (0.4) Emails and phone calls with Jenny Martinez regarding responding to the Magistrate. (0.4) Suggesting mediators to opposing parties. (0.2) Draft email to Magistrate Becerra regarding decision of SoftwareOne counsel. (0.2) Emails with Stephanie Casey on privilege issues in light of SoftwareOne's position. (0.3)	4.3	550	\$2,365.00	Peter E Berlowe	4.3	0	0	0	0	0	0	0	0
7/13/2023	Prepare for deposition of Patrice Sanchez; (0.5) take deposition of Patrice Sanchez; (1.4) analysis of same with PEB and strategize going forward; (0.4) prepare for deposition of Abigail Leonard; (4.0) various correspondence with opposing counsel regarding discovery issues pending. (0.3)	6.6	500	\$3,300.00	Meredith J. Gussin	0	6.6	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
7/13/2023	Attend deposition of Patrice Sanchez. (1.4) Work with Meredith Gussin in preparation for tomorrow depositions of Kim Fromme and Abigail Leonard. (1.0) Emails with Meredith Gussin on the number of our depositions, realizing Tom Wiper should not count in our total. (0.3) Reviewing case documents in preparation for depositions I will be taking later this month. (0.6) Emails with case team on case strategy and deposition preparation. (0.35)	3.65	550	\$2,007.50	Peter E Berlowe	3.65	0	0	0	0	0	0	0	0
7/12/2023	Review of case; (1.9) follow up emails and calls. (0.3)	2.2	400	\$880.00	Veronique Malebra	0	0	0	0	0	0	2.2	0	0
7/12/2023	Prepare for deposition of Patrice Sanchez: (1.2) review text messages between Patrice and Ronda McNae; (0.5) prepare outline for deposition; (1.1) discuss hearing with PEB on discovery issues; (0.4) prepare discovery responses; (0.9) legal research regarding waiver of spousal privilege with consortium claim. (1.4)	5.5	500	\$2,750.00	Meredith J. Gussin	0	5.5	0	0	0	0	0	0	0
7/12/2023	Review motion to file under seal. (0.3) Prepare for and attend discovery hearing before Magistrate Becerra. (2.1) Work with Meredith Gussin on tomorrow's depositions of Patrice Sanchez. (2.5) Emails with Jenny Martinez regarding today's hearing and questions Judge Becerra requested I seek an answer to. (0.3)	5.2	550	\$2,860.00	Peter E Berlowe	5.2	0	0	0	0	0	0	0	0
7/11/2023	Prepare for and attend deposition of Dr. Michael DiTomaso; (8.1) prepare disclosure of SoftwareONE communications; (0.6) telephone call with client re case; (0.7) various communications and correspondence with opposing counsel in advance of hearing on discovery issue regarding Patrice Sanchez; (0.35) review of upcoming deposition calendar. (0.25)	10	500	\$5,000.00	Meredith J. Gussin	0	10	0	0	0	0	0	0	0
7/11/2023	Review of case; (2.2) follow up emails and calls. (0.4)	2.6	400	\$1,040.00	Veronique Malebra	0	0	0	0	0	0	2.6	0	0
7/11/2023	Emails with case team regarding communications between Landau and SoftwareOne's counsel. (0.4) Reviewing case documents and preparing for upcoming fact and expert depositions. (2.4) Serve additional documents on opposing party. (0.3) Speak to Meredith Gussin regarding Dr. DiTomaso's deposition. (0.4) Prepare for tomorrow's discovery hearing before Magistrate Becerra. (3.4) Emails with Meredith Gussin regarding same. (0.3)	7.2	550	\$3,960.00	Peter E Berlowe	7.2	0	0	0	0	0	0	0	0
7/10/2023	Prepare discovery responses; (0.4) prepare for meet and confer; (0.3) telephone conference with Dr. DiTomaso to prepare for deposition; (0.5) review Dr. DiTomaso's report, rebuttal report and Dr. Judy Ho's rebuttal; (0.4) meet and confer with opposing counsel regarding pending matters; (0.3) correspondence internally regarding pending issues; (0.3) prepare for deposition of Dr. DiTomaso. (1.0)	3.2	500	\$1,600.00	Meredith J. Gussin	0	3.2	0	0	0	0	0	0	0
7/10/2023	Discovery Review of Yelany's texts. (6.0)	6	400	\$2,400.00	Veronique Malebra	0	0	0	0	0	0	0	6	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
7/10/2023	Conference with Meredith Gussin regarding meet and confer regarding discovery issues. (0.3) Review supplement discovery served today from Ronda McNae. (0.2) Emails with Meredith Gussin on number of depositions noticed by us. (0.1) Emails with opposing counsel regarding Dr. DiTomasso's data. (0.2) Review supplemental production received today from Ronda McNae. (0.3) Preparing for fact and expert depositions occurring later this month. Email to Mike Fitzgerald regarding Philip Landau. (0.1) Emails with Meredith Gussin regarding additional production from our side of the case. (0.2) Phone conference with Peter Koziol regarding expert testimony. (0.5)	2.2	550	\$1,210.00	Peter E Berlowe	2.2		0	0	0	0	0	0	0
7/10/2023	Telephonic conference w/ P. Berlowe regarding Rule 26 a disclosure of expert testimony. (0.5)	0.5	550	\$275.00	Peter A. Koziol		0	0	0	0.5	0	0	0	0
7/9/2023	Prepare for discovery meet and confer; (0.7) review expert reports. (2.5)	3.2	500	\$1,600.00	Meredith J. Gussin		0	3.2	0	0	0	0	0	0
7/9/2023	Telephone conference with Peter to discuss pending matters, upcoming depositions, status of case; (0.8) strategy going forward. (0.2)	1	500	\$500.00	Meredith J. Gussin		0	1	0	0	0	0	0	0
7/8/2023	Review Brock Weedman documents in anticipation of litigation, (5.3) correspondence with Dr. DiTomasso, (0.3) review emails and various correspondence regarding discovery disputes. (0.4)	6	500	\$3,000.00	Meredith J. Gussin		0	6	0	0	0	0	0	0
7/7/2023	Emails regarding Sheri Fiske deposition transcript. (0.2) Review notices of deposition that arrived today. (0.1) Emails with case team on case strategy. (0.3)	0.6	550	\$330.00	Peter E Berlowe	0.6		0	0	0	0	0	0	0
7/6/2023	Emails with opposing counsel regarding time to reserve for Dr. Ho's deposition. (0.2) Emails with opposing counsel regarding Dr. Ho not having data sent by Dr. DiTomasso. (0.3) Reviewing case documents and preparing expert and fact witness depositions happening this month. (2.1) Emails with case team regarding issues with Yelany's texts. (0.35) Review letter from Persefoni's counsel. (0.15)	3.1	550	\$1,705.00	Peter E Berlowe	3.1		0	0	0	0	0	0	0
7/5/2023	Reviewing case documents and preparing expert and fact witness depositions happening this month. (2.4) Reviewing portions of Yelany's texts and how they can fit into the case. (0.8)	3.2	550	\$1,760.00	Peter E Berlowe	3.2		0	0	0	0	0	0	0
7/4/2023	Emails with Meredith Gussin regarding outstanding discovery disputes. (0.1)	0.1	550	\$55.00	Peter E Berlowe	0.1		0	0	0	0	0	0	0
7/3/2023	Continue reviewing and redacting Yelany's texts. (2.0)	2	500	\$1,000.00	Meredith J. Gussin		0	2	0	0	0	0	0	0
7/3/2023	Emails with opposing counsel and case team regarding deposition of Sarah Dellinger. (0.1) Call with Jenny Martinez counsel for SoftwareOne. (0.4) Emails with Meredith Gussin regarding same. (0.2) Reviewing case documents and preparing for the multitude of depositions occurring this month. (2.1) Scheduling of Dr. Ho's deposition. (0.2)	3	550	\$1,650.00	Peter E Berlowe	3		0	0	0	0	0	0	0
6/30/2023	Prepare Bates Labeling for production of agreement under supplemental discovery. (0.2)	0.2	400	\$80.00	Francisco J. Barreto		0	0	0	0	0.2	0	0	0
6/30/2023	Preparing for expert depositions. (1.3) Emails with case team on case status and strategy. (0.3)	1.6	550	\$880.00	Peter E Berlowe	1.6		0	0	0	0	0	0	0
6/29/2023	Continue review of Yelany's texts. (1.8)	1.8	500	\$900.00	Meredith J. Gussin		0	1.8	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
6/29/2023	Emails with Meredith Gussin regarding "anger" search terms within Yelany De Varona's texts. (0.2) Emails with Meredith Gussin regarding expert rebuttal reports served yesterday. (0.3) Cursory review of Defendant's rebuttal reports. (0.4) Preparing for expert depositions. (1.75) Emails with case team on case status and strategy. (0.3) Email to opposing counsel with Kim Fromme rebuttal citations. (0.25)	3.2	550	\$1,760.00	Peter E Berlowe	3.2	0	0	0	0	0	0	0	0
6/28/2023	Detailed review, culling, and analysis of text messages pulled with "lied, lie, lies, lying, liar, harass, harassment, pathological, affair, deceit, deceitful, deceiving, deceived, and deception" in order to pull only responsive information to RFP nine. (2.6)	2.6	400	\$1,040.00	Francisco J. Barreto	0	0	0	0	2.6	0	0	0	0
6/28/2023	Finalize and Serve rebuttal disclosures and reports: review Dr. Ho rebuttal report. (1.5)	1.5	500	\$750.00	Meredith J. Gussin	0	1.5	0	0	0	0	0	0	0
6/28/2023	Discovery Review. (4.0)	4	400	\$1,600.00	Veronique Malebranche	0	0	0	0	0	0	4	0	0
6/27/2023	Conference with PEB and MG regarding text message discovery issue for Yelany. (2.1)	2.1	400	\$840.00	Francisco J. Barreto	0	0	0	0	2.1	0	0	0	0
6/27/2023	Reviewing and extracting all text messages with the words "lying, lied, lie, lies, liar" contained for individual production pursuant to discovery request. (2.5)	2.5	400	\$1,000.00	Francisco J. Barreto	0	0	0	0	2.5	0	0	0	0
6/27/2023	Review Yelany text messages. (7.5)	7.5	500	\$3,750.00	Meredith J. Gussin	0	7.5	0	0	0	0	0	0	0
6/27/2023	Telephone conference with Kim Fromme regarding her findings. (0.4) Zoom conference with Meredith Gussin, Veronique Malebranche and Frank Barreto regarding case issues and Yelany texts. (4.0) Reviewing documents between Mike Fitzgerald and Prity Padhi. (0.3) Preparing for expert depositions. (0.3) Emails with Kim Fromme regarding her citations in her rebuttal report. (0.2)	5.2	550	\$2,860.00	Peter E Berlowe	5.2	0	0	0	0	0	0	0	0
6/27/2023	Meeting; (4.0) Discovery review (2.0)	6	400	\$2,400.00	Veronique Malebranche	0	0	0	0	0	0	6	0	0
6/26/2023	Review Dr. DiTomasso expert report; (0.9) review and discuss same with Dr. DiTomasso. (0.3)	1.2	500	\$600.00	Meredith J. Gussin	0	1.2	0	0	0	0	0	0	0
6/26/2023	Preparing for expert depositions. (1.5) Emails with case team on case strategy and status.(0.2) Emails with opposing counsel on Dr. DiTomasso's data for Dr. Ho. (0.1) Review emails between Mike Fitzgerald and Kentaro Kawamori. (0.3) Emails with Kim Fromme. (0.2)	2.3	550	\$1,265.00	Peter E Berlowe	2.3	0	0	0	0	0	0	0	0
6/23/2023	Review Yelany text messages (3.0)	3	500	\$1,500.00	Meredith J. Gussin	0	3	0	0	0	0	0	0	0
6/23/2023	Emails with opposing counsel and their offices regarding various outstanding case issues. (0.2) Emails with case team on case strategy and status. (0.3) Preparing for expert depositions. (1.6) Emails with Dr. DiTomasso. (0.3) Extensive phone conference with Dr. Fromme regarding her rebuttal report. (1.1) Emails with opposing counsel regarding claims of privilege to documents related to Will McNae's mother. (0.2)	3.7	550	\$2,035.00	Peter E Berlowe	3.7	0	0	0	0	0	0	0	0
6/22/2023	Correspond with client re pending discovery responses; (0.3) prepare Plaintiff's Response to Defendants' Joint Second and Third Requests for Production; (2.6) review Defendants' Reply brief in support of Motion for Claim of Privilege; (0.5) review Yelany texts; (0.8) zoom with PEB to discuss DiTomasso report; (0.6)	4.8	500	\$2,400.00	Meredith J. Gussin	0	4.8	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
6/22/2023	Review draft of Dr. DiTomasso's rebuttal report. (0.4) Call with Meredith Gussin regarding same. Review new discovery set served by William McNae. (0.4) Preparing for expert witness depositions. (1.2) Emails with case team regarding service of subpoena on Patrice Sanchez. (0.2) Review draft of Dr. Fromme's rebuttal report. (0.4) Review letter brief filed by SoftwareOne on privileged document issues. (0.7)	3.9	550	\$2,145.00	Peter E Berlowe	3.9		0	0	0	0	0	0	0
6/21/2023	Prepare documents for hearing on discovery dispute; (0.5) review SoftwareONE's brief in opposition to Defendants' Motion for Ruling on Privilege Issue; (0.4) review Yelany texts. (1.4)	2.3	500	\$1,150.00	Meredith J. Gussin		0	2.3	0	0	0	0	0	0
6/21/2023	Emails with opposing counsel and their staff regarding various outstanding case issues. (0.2) Emails with case team on case status and strategy. (0.4) Preparing for expert depositions. (2.4) Conference with Meredith Gussin regarding whether we agree to Defendants having a reply on the privileged documents issue. (0.3) Work with Meredith Gussin on providing supporting materials for filed motion. (0.4)	3.7	550	\$2,035.00	Peter E Berlowe	3.7		0	0	0	0	0	0	0
6/20/2023	Legal research to file with court for hearing on Motion regarding discovery dispute as to Philip Landau communication and work product issues re email to Patrice Sanchez; (2.6) review additional discovery propounded by defendants in response to Plaintiff's RFP; (1.2) telephone call with Kim Fromme; (0.7) zoom meeting with PEB to finalize brief in response to Defendants' motion on claim of privilege re SoftwareONE documents (0.5)	5	500	\$2,500.00	Meredith J. Gussin		0	5	0	0	0	0	0	0
6/20/2023	Emails with opposing counsel on setting discovery hearing with Magistrate Becerra. (0.2) Emails with case team on case status and strategy. (0.3) Review and revise response to motion on privileged documents. (0.6) Conference with Meredith Gussin regarding same. (0.5) Preparing for expert depositions. (2.7)	4.3	550	\$2,365.00	Peter E Berlowe	4.3		0	0	0	0	0	0	0
6/19/2023	Review Ronda McNae deposition and take notes re same; (4.3) discuss theories with Kim Fromme; (1.8) meet and confer with opposing counsel re pending discovery matters; (0.4) call with client to discuss same. (0.3)	6.8	500	\$3,400.00	Meredith J. Gussin		0	6.8	0	0	0	0	0	0
6/19/2023	Emails with case team and opposing counsel regarding various case issues. (0.3) Emails with Jenny Martinez regarding privilege issues. (0.25) Emails with Dr. DiTomasso. (0.25)	0.8	550	\$440.00	Peter E Berlowe	0.8		0	0	0	0	0	0	0
6/18/2023	Draft response to Defendants' Motion re Privileged Documents. (2.1)	2.1	500	\$1,050.00	Meredith J. Gussin		0	2.1	0	0	0	0	0	0
6/17/2023	Work on response to Motion regarding privileged SoftwareONE documents. (2.0)	2	500	\$1,000.00	Meredith J. Gussin		0	2	0	0	0	0	0	0
6/16/2023	Review Yelany text messages; (2.2) meet and confer with opposing counsel; (0.4) zoom conference with Kim Fromme. (1.7)	4.3	500	\$2,150.00	Meredith J. Gussin		0	4.3	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
6/16/2023	Emails with Meredith Gussin and Kim Fromme regarding her expert rebuttal report. (0.25) Emails with Meredith Gussin and opposing counsel on various outstanding discovery issues. (0.25) Cursory review of additional production received today from William McNae. (0.9) Reviewing case documents in preparation for expert depositions. (0.9)	2.3	550	\$1,265.00	Peter E Berlowe	2.3	0	0	0	0	0	0	0	0
6/15/2023	Correspondence with opposing counsel regarding discovery regarding lost business opportunities; (0.3) prepare Yelany response to Joint RFP; (1.3) Prepare Plaintiff's Fourth RFP to Ronda McNae; (1.6) compile documents responsive to discovery request; (0.4) prepare revised subpoena to Patrice Sanchez; (0.5) correspondence with Kim Fromme. (0.2)	3.3	500	\$1,650.00	Meredith J. Gussin	0	3.3	0	0	0	0	0	0	0
6/15/2023	Zoom conference with Mike Fitzgerald and Eric Assouline. (0.5) Emails with Mike Fitzgerald and Meredith Gussin regarding Phillip Landau. (0.3) Conference with Meredith Gussin regarding limiting discovery based upon limiting damages sought. (0.3) Preparing for expert depositions. Work with Meredith Gussin on 4th request for production. (0.8)	3.3	550	\$1,815.00	Peter E Berlowe	3.3	0	0	0	0	0	0	0	0
6/14/2023	Prepare privilege log; (0.7) follow up with client re Philip Landau; (0.3) prepare correspondence to opposing counsel regarding stipulation, pending discovery from client; (0.8) review discovery regarding Jim Hopper. (1.95)	3.75	500	\$1,875.00	Meredith J. Gussin	0	3.75	0	0	0	0	0	0	0
6/14/2023	Emails with Yelany De Varona and Meredith Gussin regarding Yelany's text messages. (0.35) Reviewing articles cited by various experts and preparing for expert depositions. (1.25) Email to Dr. DiTomasso regarding Hopper testimony and videos available online. (0.2) Emails with Meredith Gussin regarding Ronda McNae's prior communications with Jim Hopper. (0.2) Emails with opposing counsel and Meredith Gussin regarding meet and confer regarding discovery. (0.25) Review Order granting leave to file under seal. (0.1) Call with Meredith Gussin regarding privilege log she is serving today. (0.65) Emails with Mike Fitzgerald. Preparing for expert depositions. (0.3) Call with Meredith Gussin regarding Philip Landau issues and limiting damages. (0.3)	3.6	550	\$1,980.00	Peter E Berlowe	3.6	0	0	0	0	0	0	0	0
6/13/2023	Zoom with PEB and Dr. DiTomasso; (1.9) review Motion regarding SoftwareONE privileged documents; (0.7) correspondence with counsel for Microsoft, Defendants regarding stipulation. (0.6)	3.2	500	\$1,600.00	Meredith J. Gussin	0	3.2	0	0	0	0	0	0	0
6/12/2023	Take deposition of Matt Mead; (2.1) correspond with expert witnesses and opposing counsel. (1.3)	3.4	500	\$1,700.00	Meredith J. Gussin	0	3.4	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
6/12/2023	Review case emails from opposing counsel and Meredith Gussin that came in over the weekend. (0.2) Emails and calls with Meredith Gussin regarding Matt Mead Deposition. (0.35) Preparing for expert witness depositions. (1.2) Emails with Yelany De Varona regarding her text messages. (0.2) Review Order on joint motion for extension of time. (0.1) Emails with Dr. Fromme and Dr. DiTomasso. (0.2) Preparing for expert witness depositions. Review additional production from Ronda McNae receive today. (0.95) Review Errata sheet from Ronda McNae. (0.3)	3.5	550	\$1,925.00	Peter E Berlowe	3.5		0	0	0	0	0	0	0
6/11/2023	Prepare for deposition of Matt Mead; (1.5) prepare deposition outline; (1.5) review exhibits; (1.0) correspondence with Kim Fromme; (0.4) review Mike deposition transcript. (0.6)	5	500	\$2,500.00	Meredith J. Gussin	0	5	0	0	0	0	0	0	0
6/9/2023	Prepare for deposition of Abigail Leonard. (2.4)	2.4	500	\$1,200.00	Meredith J. Gussin	0	2.4	0	0	0	0	0	0	0
6/9/2023	Prepare for and attend deposition of Abigail Leonard. (0.7) Conference with Meredith Gussin regarding rescheduling same when opposing counsel would not continue under a video deposition. (0.4) Preparing for expert witness depositions. (2.3)	3.4	550	\$1,870.00	Peter E Berlowe	3.4	0	0	0	0	0	0	0	0
6/8/2023	Prepare for deposition of Abigail Leonard; (3.3) draft and edit Motion for Brief Extension of Trial Date and Pretrial deadlines; (0.3) revise same; (0.1) follow up with expert witnesses; (0.3) correspondence with opposing counsel re pending discovery issues. (0.2)	4.2	500	\$2,100.00	Meredith J. Gussin	0	4.2	0	0	0	0	0	0	0
6/8/2023	Preparing for expert witness depositions. (1.9) Emails with case team and opposing counsel regarding privileged documents. (0.3) Emails with Magistrate Becerra and opposing counsel regarding same. (0.3) Calls with Meredith Gussin regarding Abigail Leonard deposition and Matt Mead deposition. (0.6) Emails and calls with Meredith Gussin regarding privileged documents we have recalled from production. (0.3) Discuss Yelany's supplemental responses with Meredith Gussin. (0.3) Review William McNae Errata sheet. (0.2) Emails with Kim Fromme. Emails with Meredith Gussin and Dr. DiTomasso regarding his deposition. (0.3)	4.2	550	\$2,310.00	Peter E Berlowe	4.2	0	0	0	0	0	0	0	0
6/7/2023	Attend deposition of Sheri Fiske; (2.5) prepare requests for production; (2.2) analysis of issues in case; (0.3) correspondence with client re same. (0.2)	5.2	500	\$2,600.00	Meredith J. Gussin	0	5.2	0	0	0	0	0	0	0
6/7/2023	Preparing for Jim Hopper deposition. (1.5) Watching portions of Jim Hopper's trial testimony and lectures posted online. (1.1) Telephone conference with Meredith Gussin regarding today's deposition of Sheri Fiske. (0.4) Comparing Hopper's report in this case to past statements he has made. (0.5)	3.5	550	\$1,925.00	Peter E Berlowe	3.5	0	0	0	0	0	0	0	0
6/6/2023	Conduct strategy conference with PEB and MG to discuss remaining discovery issues, subpoena issues, strategy in handling quashing of subpoenas, and other related issues. (2.8)	2.8	400	\$1,120.00	Francisco J. Barreto	0	0	0	0	2.8	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
6/6/2023	Telephone conference with Sheri Fiske to prepare for deposition; (1.6) Telephone conference with PEB and FJB to ascertain issues regarding waiver of lost business opportunities, analysis of issues regarding waiver of reputational harm damages; (2.8) scheduling of depositions; (0.2) production of updated documents in response to request for production of document, etc. (0.6)	5.2	500	\$2,600.00	Meredith J. Gussin	0	5.2	0	0	0	0	0	0	0
6/6/2023	Zoom conference with Meredith Gussin and Frank Barreto regarding case strategy and status. (2.7) Preparing for Hopper deposition. Emails with opposing counsel and case team regarding limiting certain discovery if Mike Fitzgerald agrees to not seek certain damages. (0.3) Telephone conference with Meredith Gussin and Sheri Fiske regarding her expert report and deposition preparation. (1.2) Conference with Meredith Gussin regarding having a meet and confer with opposing counsel on Kawamori, Persefoni and Rice. (0.3) Work with Meredith Gussin and Sheri Fiske on Fiske supplementing Sheri Fiske's report. (0.1)	4.2	550	\$2,310.00	Peter E Berlowe	4.2	0	0	0	0	0	0	0	0
6/5/2023	Review Will McNae medical records; (0.9) conversation with Abby Leonard regarding deposition and records; (0.6) review list of individuals needed to be deposed; (0.3) t/c with Kim Fromme; (0.5) compile Jim Hopper documents for Kim Fromme; (0.6) review DiJulio filings; (0.55) draft privileged communication to opposing counsel regarding waiver of lost business opportunities. (0.35)	3.8	500	\$1,900.00	Meredith J. Gussin	0	3.8	0	0	0	0	0	0	0
6/5/2023	Preparing for Expert Hopper's deposition. (1.3) Emails and calls with Meredith Gussin on case status and strategy. (0.3) Review supplemental document production served today by Ronda McNae. (0.7) Cursory review of Hopper documents served late today. (0.25) Work with Meredith Gussin on correspondence to opposing counsel regarding waiving claim to lost business opportunities. (1.2)	3.75	550	\$2,062.50	Peter E Berlowe	3.75	0	0	0	0	0	0	0	0
6/2/2023	Telephone conference with Kim Fromme and PEB; (1.2) review correspondence with o/c. (0.3)	1.5	500	\$750.00	Meredith J. Gussin	0	1.5	0	0	0	0	0	0	0
6/1/2023	Emails with opposing counsel and Meredith Gussin regarding meet and confer related to discovery disputes. (0.3) Review McNae's supplemental responses to first request for production of documents. (1.05) Review supplemental expert disclosure related to Dr. Bhaskar. (0.25) Cursory review of Fromme citations in her expert report (0.3)	3.4	550	\$1,870.00	Peter E Berlowe	3.4	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
6/1/2023	Prepare for deposition prep session with Sheri Fiske. (.05) Attend deposition prep session with Sheri Fiske. (1.3) Telephone conference with Mike Fitzgerald regarding forgoing damages related to loss of business opportunity. (0.3) Emails with Meredith Gussin regarding same. (0.2) Emails with opposing counsel regarding deposition of expert Sheri Fiske. (0.1) Telephone conference with Kim Fromme and Meredith Gussin. (0.6) Work with Meredith Gussin and Kim Fromme regarding case list. (0.4) Reviewing case documents produced by the parties in conjunction with expert reports. (0.1)	3.5	550	\$1,925.00	Peter E Berlowe	3.5		0	0	0	0	0	0	0
5/31/2023	Meeting with clients and PEB to discuss discovery, depositions, trial calendar, strategy, etc; (2.1) meet and confer with defense counsel to discuss multitude of pending matters; (0.8) legal research regarding expert witness reports; (0.5) compile citations of Kim Fromme for production of same. (0.6)	4	500	\$2,000.00	Meredith J. Gussin	0	4	0	0	0	0	0	0	0
5/31/2023	Emails, zooms and calls with Meredith Gussin on case issues and strategy. (0.2) Review articles from Expert Fromme. (0.3) Reviewing case documents. Conference with Mike Fitzgerald, Meredith Gussin and Yelany De Varona. (2.1) Attend meet and confer with opposing counsel and Meredith Gussin regarding discovery disputes. (0.8) Preparing with Meredith Gussin for Expert Fiske's deposition. (0.2) Emails with Gino Capece. (0.2)	3.9	550	\$2,145.00	Peter E Berlowe	3.9		0	0	0	0	0	0	0
5/30/2023	Prepare case list of Kim Fromme, including research involved in preparation of same; (1.9) prepare Notice of Ninety Days Expiring; (0.2) review docket; (0.3) prepare for meet and confer; (0.5) correspondence with experts. (0.2)	3.1	500	\$1,550.00	Meredith J. Gussin	0	3.1	0	0	0	0	0	0	0
5/30/2023	Emails, zooms and calls with Meredith Gussin on case issues and strategy. (0.5) Emails with Mike Fitzgerald on case issues. (0.3) Review articles sent by Expert Fromme. (1.1) Reviewing production documents from McNaes. (1.1) Emails with Expert Fiske's office. (0.2) Prepare for tomorrow's meet and confer with opposing counsel. (0.3) Confer with case team on filing notice of ripeness on motion to dismiss. (0.3)	3.8	550	\$2,090.00	Peter E Berlowe	3.8		0	0	0	0	0	0	0
5/29/2023	Emails, zooms and calls with Meredith Gussin on case issues and strategy. (0.4) Emails with Mike Fitzgerald on case issues. (0.3) Reviewing case documents. (2.5)	3.2	550	\$1,760.00	Peter E Berlowe	3.2		0	0	0	0	0	0	0
5/26/2023	Emails, zooms and calls with Meredith Gussin on case issues and strategy. (0.6) Address fact witness Abigail Leonard issues with Meredith Gussin. (0.3) Emails with Expert Fromme on case list. (0.3) Background research on Patrice Sanchez. Emails with counsel for Will McNae. (0.2) Working on finding case numbers for Dr. Fromme's prior cases. (0.7)	3.2	550	\$1,760.00	Peter E Berlowe	3.2		0	0	0	0	0	0	0
5/25/2023	Discuss with Peter Berlowe status of discovery issues to be heard before Magistrate Judge. (0.15 NO CHARGE)	0	0	\$0.00	Eric N. Assouline	0		0	0	0	0	0	0	0
5/25/2023	Attend hearing on Defendants' Motion to Quash Churchome Subpoena and Defendants' Motion to Compel Kim Fromme Case List; (2.0) analysis and strategize going forward. (0.5)	2.5	500	\$1,250.00	Meredith J. Gussin	0	2.5	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
5/25/2023	Attend discovery hearing before Magistrate Becerra. (2.0) Meet with opposing counsel after hearing. (0.2) Emails, zooms and calls with Meredith Gussin on case issues and strategy. (0.5) Review proposed orders forwarded by opposing counsel and provide confirmation to their use. (0.2) Email to Kim Fromme on providing case list. (0.2) Emails with Frank Barreto regarding hybrid expert/fact witnesses. (0.2) Emails with case team on Will McNae's emotional distress damages and "garden variety" issues. (0.3) Reviewing case documents. (0.7) Emails with expert Fromme on issues with case list. (0.2) Review Notice of Deposition for Expert Fiske. (0.1)	4.6	550	\$2,530.00	Peter E Berlowe	4.6	0	0	0	0	0	0	0	0
5/24/2023	Conduct zoom conference with PEB and MG regarding remaining discovery, motions to strike experts, and other related issues and strategizing summary judgment issues pretrial. (2.5)	2.5	400	\$1,000.00	Francisco J. Barreto	0	0	0	0	2.5	0	0	0	0
5/24/2023	Conference call with PEB and FJB regarding legal issues; (2.5) conference call with Kim Fromme and PEB regarding expert witness disclosures and rebuttal reports; (0.3) prepare memo in advance of hearing on Churchome motion to quash and expert witness disclosure issues. (2.0)	4.8	500	\$2,400.00	Meredith J. Gussin	0	4.8	0	0	0	0	0	0	0
5/24/2023	Review federal rule 26 and local rule 16.1 for purposes of reviewing for amendments to rules concerning expert case lists to prepare with partner for hearing on 5/25 on this issue. (0.4)	0.4	400	\$160.00	Francisco J. Barreto	0	0	0	0	0.4	0	0	0	0
5/24/2023	Emails, zooms and calls with Meredith Gussin on case issues and strategy. (2.5) Preparing for tomorrow's discovery hearing. (1.0) Emails with expert Fiske. (0.1) Emails with Meredith Gussin and opposing counsel on case issues. (0.1) Emails with Expert Fromme. (0.1) Telephone conference with Expert Fromme and Meredith Gussin. (0.3) Reviewing document production from McNae. (0.3) Emails with Mike Fitzgerald. (0.1)	4.5	550	\$2,475.00	Peter E Berlowe	4.5	0	0	0	0	0	0	0	0
5/23/2023	Legal research regarding issue in preparation of Churchome deposition; (1.3) preparation as to issue with respect to expert witness disclosure; (1.1) correspondence to opposing counsel regarding deficiencies in disclosures. (0.4)	2.8	500	\$1,400.00	Meredith J. Gussin	0	2.8	0	0	0	0	0	0	0
5/23/2023	Emails, zooms and calls with Meredith Gussin on case issues and strategy. (0.7) Reviewing document production from McNae. (1.6) Emails with Mike Fitzgerald on case issues. (0.2) Review documents from Expert Fromme. (0.7) Review 3rd Joint request for production to Mike Fitzgerald. (0.25) Emails with Expert DiTomaso. (0.15) Emails with opposing counsel on various discovery and expert issues. (0.2) Review list of cases from Dr. DiTomaso. (0.6)	4.2	550	\$2,310.00	Peter E Berlowe	4.2	0	0	0	0	0	0	0	0
5/22/2023	Meet and confer with opposing counsel regarding discovery disputes; (0.5) legal research regarding pending matters. (3.7)	4.2	500	\$2,100.00	Meredith J. Gussin	0	4.2	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
5/22/2023	Attend meet and confer on discovery objections with opposing counsel and Meredith Gussin. (0.5) Emails, zooms and calls with Meredith Gussin on case issues and strategy. (0.4) Review emails from Exert Fromme that came in over the weekend. (0.2) Emails with Meredith Gussin and opposing counsel regarding Dr. DiTommaso's data. (0.25) Reviewing case documents. (1.65) Emails amongst case counsel and Magistrate Becerra. (0.25)	3.25	550	\$1,787.50	Peter E Berlowe	3.25		0	0	0	0	0	0	0
5/21/2023	Research regarding standards of case lists required for Federal rule expert witness disclosure; (0.8) correspondence with Dr. DiTommaso. (0.2)	1	500	\$500.00	Meredith J. Gussin	0	1	0	0	0	0	0	0	0
5/19/2023	Prepare documents responsive to Joint Request for Production; (1.2) Legal research regarding withholding of raw data from psychologist; (0.5) prepare for meet and confer; (1.1) correspondence with counsel for Churchome. (0.2)	3	500	\$1,500.00	Meredith J. Gussin	0	3	0	0	0	0	0	0	0
5/19/2023	Emails, zooms and calls with Meredith Gussin on case issues and strategy. (1.0) Reviewing case documents. (1.8) Legal research on joint defense privilege issues. (0.4) Emails from and to opposing counsel. (0.2) Emails with Expert Fiske's office on case issues. (0.3) Multiple conferences with Meredith Gussin on expert report exhibits. (0.3) Research regarding ethical guidelines unpinning Dr. DiTommaso's not wanting to hand over certain testing data. (0.5) Discuss same with Meredith Gussin. (0.3)	4.8	550	\$2,640.00	Peter E Berlowe	4.8		0	0	0	0	0	0	0
5/18/2023	Analysis of legal issues regarding expert witness disclosures, rebuttal summaries, discovery pending and disputes. (3.0)	3	500	\$1,500.00	Meredith J. Gussin	0	3	0	0	0	0	0	0	0
5/18/2023	Emails, zooms and calls with Meredith Gussin on case issues and strategy. (0.5) Review subpoenas to Software One and Rice Investment Group, LP. (0.3) Emails with opposing counsel regarding Dr. DiTommaso's deposition. (0.2) Telephone conference with Jenny Martinez and Michael McCabe. (0.6) Emails with Expert Fiske. (0.2) Reviewing case documents. (1.7) Email from Jenny Martinez. (0.1) Extensive phone conference with Jenny Martinez and Mike McCabe. (1.1)	4.7	550	\$2,585.00	Peter E Berlowe	4.7		0	0	0	0	0	0	0
5/17/2023	Telephone call with Kim Fromme, expert; (1.5) revise deficiencies and omissions in expert disclosures, (0.4) prepare for and take deposition of Sirena Herd; (1.8) review documents to be produced in response to recent RFP; (0.9) prepare discovery requests to be sent to Defendants. (0.6)	5.2	500	\$2,600.00	Meredith J. Gussin	0	5.2	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
5/17/2023	Attend deposition of Serina Herd. (1.2) Emails, zooms and calls with Meredith Gussin on case issues and strategy. (0.8) Working with Meredith Gussin on additional document requests to Ronda McNae. (0.5) Reviewing case documents. (0.9) Emails regarding how hearing went in Seattle case. (0.3) Reviewing Mike's text messages with Yelany to see what types of information Yelany should have in response to latest document requests. (0.5) Emails with opposing counsel on case issues. Reviewing and revising additional set of interrogatories. (0.3) Review second joint request for production to Mike Fitzgerald. (0.3) Emails to Expert Fiske. (0.2)	5.2	550	\$2,860.00	Peter E Berlowe	5.2	0	0	0	0	0	0	0	0
5/16/2023	Revise expert witness disclosures; (0.3) telephone call with PEB regarding same; (0.2) prepare research in advance of hearing on Defendant's motion for protective order regarding Churchhome subpoena. (2.5)	3	500	\$1,500.00	Meredith J. Gussin	0	3	0	0	0	0	0	0	0
5/16/2023	Emails, zooms and calls with Meredith Gussin on case issues and strategy. (2.5) Emails with Kim Fromme regarding recent deposition transcripts. (0.2) Working with Meredith Gussin to prepare for tomorrow's deposition of Serina Herd. (0.5) Emails with case counsel and Magistrate Becerra on scheduling discovery hearing. (0.2) Work with Meredith on research to include in notice of hearing for discovery hearing. (0.2) Legal research regarding same. (0.2) Review new request for production to Yelany De Varona. (0.25) Forward same to clients. (0.15)	4.2	550	\$2,310.00	Peter E Berlowe	4.2	0	0	0	0	0	0	0	0
5/15/2023	Prepare Rule 26 Expert Witness Disclosures and compile all expert witness reports and summaries; (4.2) prepare responses to Joint Interrogatories and Joint Request for Production of Documents; (2.1) prepare Fitzgerald's Third Request for Production of documents to McNae; (0.4) correspondence with third party witnesses to schedule depositions. (0.3)	7	500	\$3,500.00	Meredith J. Gussin	0	7	0	0	0	0	0	0	0
5/15/2023	Review emails between Kim Fromme and Meredith Gussin from over the weekend. (0.2) Emails, zooms and calls with Meredith Gussin on case issues and strategy. (1.3) Emails with opposing counsel and Meredith Gussin on various discovery issues/disputes. (0.3) Review email from David Carpenter's attorney and enclosed document. (0.3) Review supplemental discovery response drafts provided by Mike Fitzgerald. (0.4) Review interrogatory responses from Mike Fitzgerald. (0.4) Review Ronda McNae's supplemental responses to discovery received today. (0.4) Review expert witness disclosures received from McNae's counsel. (0.3) Drafting and work with Meredith Gussin on Fitzgerald's expert witness disclosures. (0.7) Review expert report from Fiske (1.1)	5.4	550	\$2,970.00	Peter E Berlowe	5.4	0	0	0	0	0	0	0	0
5/12/2023	Draft responses to Joint Interrogatories and Joint Request for Production of Documents; (3.7) prepare amended trial witness list; (0.5) telephone conference with Kim Fromme regarding expert witness report. (0.8)	5	500	\$2,500.00	Meredith J. Gussin	0	5	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
5/12/2023	Emails, zooms and calls with Meredith Gussin on case issues and strategy. (0.45) Review additional Azaiah Carew documents received today. (1.2) Send my third party emails to Meredith Gussin. (0.2) Review draft of report from Expert Fromme. (0.5) Call with Meredith Gussin and Kim Fromme. (1.4)	3.75	550	\$2,062.50	Peter E Berlowe	3.75		0	0	0	0	0	0	0
5/11/2023	Telephone conference with Dr. Michael DiTomaso; (3.2) meet and confer zoom with Alaina Fotiu-Wojikowicz to discuss subpoena on Churchome; (0.6) zoom meeting with Fiske and Co. to discuss expert witness report for damages analysis. (3.2)	7	500	\$3,500.00	Meredith J. Gussin	0		7	0	0	0	0	0	0
5/11/2023	Attend Meet and Confer with opposing counsel and Meredith Gussin. (0.6) Emails, zooms and calls with Meredith Gussin on case issues and strategy. (0.3) Zoom conference with Meredith Gussin and Dr. DiTamaso. (1.1) Teams conference with Expert Sheri Fiske and her team. (1.2) Discover McNae's have a special cell phone they are using to avoid producing documents. (0.3) Emails with Expert Fromme. (0.3)	3.8	550	\$2,090.00	Peter E Berlowe	3.8		0	0	0	0	0	0	0
5/10/2023	Zoom conference to strategize with PEB and MIG to prepare for meet and confer on recent discovery objections from opposing counsel. (1.4)	1.4	400	\$560.00	Francisco J. Barreto	0		0	0	0	1.4	0	0	0
5/10/2023	Conference with PEB and FJB to discuss expert witness issues, Rule 35 Motion, character evidence admissibility; (1.4) Churchome subpoena, deposition schedule, case strategy. (1.0)	2.4	500	\$1,200.00	Meredith J. Gussin	0		2.4	0	0	0	0	0	0
5/10/2023	Emails, zooms and calls with Meredith Gussin on case issues and strategy. (2.4) Reviewing discovery documents recently produced. (0.8)	3.2	550	\$1,760.00	Peter E Berlowe	3.2		0	0	0	0	0	0	0
5/9/2023	Attend deposition of Marisa Carew; (2.2) communicate with expert witness. (3.6)	5.8	500	\$2,900.00	Meredith J. Gussin	0		5.8	0	0	0	0	0	0
5/9/2023	: Respond to opposing counsel's threats of sanctions if we ask questions about Ronda McNae's parenting or promiscuity. (0.2) Attend deposition of Marissa Carew. (2.2) Emails, zooms and calls with Meredith Gussin on case issues and strategy. (0.4) Review Mike Fitzgerald's data sent to Expert Fiske's office today. (1.2) Emails from Expert Fromme. (0.2) Emails with opposing counsel wanting another meet and confer on discovery issues. (0.2)	4.4	550	\$2,420.00	Peter E Berlowe	4.4		0	0	0	0	0	0	0
5/8/2023	Attend deposition of Azaiah Carew; (2.0) prepare for deposition of Marisa Carew. (4.2)	6.2	500	\$3,100.00	Meredith J. Gussin	0		6.2	0	0	0	0	0	0
5/8/2023	: Attend deposition of Azaiah Carew. (2.0) Emails, zooms and calls with Meredith Gussin on case issues and strategy. (0.6) Emails with opposing counsel regarding limited availability for their expert Jim Hopper. (0.2) Emails with expert Fiske's office on issues they need help from Mike Fitzgerald. (0.4) Review additional documents produced by the McNaes. (1.4) Emails with expert Fromme. (0.2)	4.8	550	\$2,640.00	Peter E Berlowe	4.8		0	0	0	0	0	0	0
5/6/2023	Prepare for Deposition of Azaiah Carew. (5.1)	5.1	500	\$2,550.00	Meredith J. Gussin	0		5.1	0	0	0	0	0	0
5/5/2023	Conduct detailed strategy call with client Meredith and Peter concerning RULE 35 issues, expert report issues, and remaining pretrial items in addition to local rule analysis on 7.1(b)(4) on stale motion. (2.4)	2.4	400	\$960.00	Francisco J. Barreto	0		0	0	0	2.4	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
5/5/2023	Conduct extensive research on Rule 35 and mental distress and when mental condition would be put in controversy as opposed to physical injury and how it effects good cause in the 11th Cir. and SD of Fla., and prepare two standard motions for medical mental examinations under Rule 35. (2.0)	2	400	\$800.00	Francisco J. Barreto	0	0	0	0	2	0	0	0	0
5/5/2023	Telephone call with counsel for Ronda and Will McNae; (0.5) Conference with PEB and FJB regarding issues re expert witness summaries, Rule 35 motion: depositions to be taken; (2.4) call with Dr. DiTomasso regarding summary of Ronda McNae in advance of expert witness deadline. (1.6)	4.5	500	\$2,250.00	Meredith J. Gussin	0	4.5	0	0	0	0	0	0	0
5/5/2023	Attend meet and confer with Meredith Gussin and opposing counsel. (0.5) Work with Meredith Gussin on amended witness list. (0.3) Emails, zooms and calls with Meredith Gussin on case issues and strategy. (2.4) Emails with Dr. DiTomasso and Meredith Gussin. (0.2) Emails with expert Fiske's office regarding items they need from Mike Fitzgerald. (0.2) Preparing Azaiah Carew documents for production. (0.3)	3.9	550	\$2,145.00	Peter E Berlowe	3.9	0	0	0	0	0	0	0	0
5/4/2023	Analysis of Rule 35 Motion; (0.6) Review correspondence in advance of Azaiah and Marisa's depositions. (1.9)	2.5	500	\$1,250.00	Meredith J. Gussin	0	2.5	0	0	0	0	0	0	0
5/4/2023	Emails, zooms and calls with Meredith Gussin on case issues and strategy. (1.1) Review subpoenas issued by the McNaes' counsel. (0.25) Emails with McNae's counsel's office regarding tomorrow's meet and confer. (0.2) Prepare for tomorrow's meet and confer. (0.75) Emails with expert Fiske's team. (0.3) Research regarding whereabouts of Tania Ploessel. (0.5) Emails with Dennis McGlothlin and Meredith Gussin. (0.3)	3.4	550	\$1,870.00	Peter E Berlowe	3.4	0	0	0	0	0	0	0	0
5/3/2023	Conduct research on federal work product privilege in context of statements and texts between counsel and third parties in anticipation of litigation. (0.5)	0.5	400	\$200.00	Francisco J. Barreto	0	0	0	0	0.5	0	0	0	0
5/3/2023	Prepare memorandum to Meredith Gussin and communicate on strategy call to discuss findings on work product and recommend strategy in producing the texts between firm and third party. (0.4)	0.4	400	\$160.00	Francisco J. Barreto	0	0	0	0	0.4	0	0	0	0
5/3/2023	Analysis of waiver of offer of settlement issue; (0.4) prepare response to interrogatories and request for production; (1.1) call with client and PEB to discuss outstanding discovery and documents needed by damages expert; (0.5) call with David Carpenter and attorney to discuss various factual inconsistencies. (0.5)	2.5	500	\$1,250.00	Meredith J. Gussin	0	2.5	0	0	0	0	0	0	0
5/3/2023	Zoom conference with Meredith Gussin, Ben VandenBerghe and David Carpenter. (0.5) Emails, zooms and calls with Meredith Gussin on case issues and strategy. (1.1) Research on work privilege concerns. (0.4) Telephone conference with Jessica Travers, counsel for Persephone and Kentaro. (0.4) Emails with Dr. DiTomasso and Meredith Gussin. (0.3)	2.7	550	\$1,485.00	Peter E Berlowe	2.7	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
5/2/2023	Prepare Subpoenas for Churcho, Microsoft, Patrice Sanchez, coordinate depositions; (0.7) revise declaration in support of criminal case against Ronda McNae for restraining order. (0.9)	1.6	500	\$800.00	Meredith J. Gussin	0	1.6	0	0	0	0	0	0	0
5/2/2023	Review final executed declaration from Mike Fitzgerald. (1.6) Emails with client and Meredith Gussin regarding case issues and strategy. (0.3) Review new draft discovery responses from Mike Fitzgerald. (1.4) Calls and zoom with Meredith Gussin on case issues and strategy. (0.2) Emails with opposing counsel on issues for Carew depositions. (0.2) Emails with Dennis McGlothlin. (0.25) Emails with various case vendors on discovery and deposition issues. (0.35)	4.3	550	\$2,365.00	Peter E Berlowe	4.3	0	0	0	0	0	0	0	0
5/1/2023	Prepare documents in response to request for production in advance of Marisa and Azaiah Carew depositions; (1.7) prepare/edit Trial Witness List. (0.4)	2.1	500	\$1,050.00	Meredith J. Gussin	0	2.1	0	0	0	0	0	0	0
5/1/2023	Emails with case team and Expert Fiske's office regarding issues related to her expert opinion. (0.6) Emails with Dennis McGlothlin regarding declaration for Mike Fitzgerald. (0.3) Research on finding Matt Meade, David Totten, Jared Chaney, Justin Nipp, PJ Marcello, and Whitney Hillis. (0.7) Emails with counsel for David Carpenter. (0.4) Emails with opposing counsel on case issue. (0.5) Multiple calls and emails with Meredith Gussin on case issues and strategy. (1.4)	3.7	550	\$2,035.00	Peter E Berlowe	3.7	0	0	0	0	0	0	0	0
4/30/2023	Telephone conference with clients, PEB and Dennis McGlothlin to discuss grooming case and other issues re Ronda McNae. (2.3)	2.3	500	\$1,150.00	Meredith J. Gussin	0	2.3	0	0	0	0	0	0	0
4/30/2023	Emails with Meredith Gussin on deposing Patrice Sanchez. (0.1) Prepare for and attend zoom conference with attorney for DeJulios to compare information on the McNaes. (1.3) Review proposed declaration for Mike Fitzgerald. (0.2)	1.6	550	\$880.00	Peter E Berlowe	1.6	0	0	0	0	0	0	0	0
4/28/2023	Deposition of Ronda McNae. (11.0)	11	500	\$5,500.00	Meredith J. Gussin	0	11	0	0	0	0	0	0	0
4/28/2023	Prepare for and attend deposition of Ronda McNae. (10.7) Text messages with Yelany De Varona regarding same. (0.2) Review Defendants' trial witness lists. (0.1) Finalize our trial witness list. (0.2)	11.2	550	\$6,160.00	Peter E Berlowe	11.2	0	0	0	0	0	0	0	0
4/27/2023	Prepare for Ronda McNae deposition. (2.8)	2.8	500	\$1,400.00	Meredith J. Gussin	0	2.8	0	0	0	0	0	0	0
4/27/2023	Working with Meredith Gussin in preparation for Ronda McNae's deposition. (3.3) Working with Meredith Gussin on trial witness list. (0.4) Emails with attorney for Persefoni. (1.2) Emails with attorney for DeJulios. (1.2)	6.1	550	\$3,355.00	Peter E Berlowe	6.1	0	0	0	0	0	0	0	0
4/26/2023	Deposition of Will McNae. (11.5)	11.5	500	\$5,750.00	Meredith J. Gussin	0	11.5	0	0	0	0	0	0	0
4/26/2023	Prepare for and attend deposition of Will McNae. (11.6)	11.6	550	\$6,380.00	Peter E Berlowe	11.6	0	0	0	0	0	0	0	0
4/25/2023	Review documents and prepare for Ronda and Will's Depositions. (8.5)	8.5	500	\$4,250.00	Meredith J. Gussin	0	8.5	0	0	0	0	0	0	0
4/25/2023	Preparing with Meredith Gussin for tomorrow's deposition of Will McNae and Ronda McNae's deposition later in the week. (5.0) Emails to client on retaining damages expert. (0.3) Review objections to subpoenas served by Persefoni and Kentaro Kawamori. (0.4)	5.7	550	\$3,135.00	Peter E Berlowe	5.7	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
4/24/2023	Review documents in preparation for Ronda and Will McNae's depositions. (8.5)	8.5	500	\$4,250.00	Meredith J. Gussin	0	8.5	0	0	0	0	0	0	0
4/24/2023	Working with Meredith Gussin in preparation for Defendants' depositions later this week. (5.5) Telephone conference with Jeff Sun, in house counsel for Persefoni. (0.5) Emails with Meredith Gussin regarding same. (0.2)	6.2	550	\$3,410.00	Peter E Berlowe	6.2	0	0	0	0	0	0	0	0
4/23/2023	Prepare for Deposition of Will McNae. (5.8)	5.8	500	\$2,900.00	Meredith J. Gussin	0	5.8	0	0	0	0	0	0	0
4/23/2023	Working with Meredith Gussin in preparation for Will McNae's deposition. (2.7) Reviewing McNae document productions in support thereof. (0.6)	3.3	550	\$1,815.00	Peter E Berlowe	3.3	0	0	0	0	0	0	0	0
4/21/2023	Prepare for depositions of Ronda and Will McNae. (3.0)	3	500	\$1,500.00	Meredith J. Gussin	0	3	0	0	0	0	0	0	0
4/21/2023	Multiple conferences and emails with Meredith Gussin on Will and Ronda McNae depositions and preparation therefor. (3.0) Work with copy vendor on getting copies of exhibits printed for depositions. (0.4) Emails with economic damages expert. (0.3) Begin reviewing Ronda McNae's supplemental responses to our 1st and second requests for production of documents received today. (0.5)	4.2	550	\$2,310.00	Peter E Berlowe	4.2	0	0	0	0	0	0	0	0
4/20/2023	Prepare for deposition of Ronda McNae (5.0)	5	500	\$2,500.00	Meredith J. Gussin	0	5	0	0	0	0	0	0	0
4/20/2023	Emails and calls with case team on cross noticing Azaiah Carew, Marissa Carew depositions, (0.1) and same for Abigail Leonard if it gets set. (0.1) Emails with opposing counsel on which depositions they plan on taking in Seattle. (0.2) Preparing for next week's depositions of the defendants with Meredith Gussin. Selecting deposition exhibits. (3.1)	3.5	550	\$1,925.00	Peter E Berlowe	3.5	0	0	0	0	0	0	0	0
4/19/2023	Prepare for deposition of Ronda McNae (7.0)	7	500	\$3,500.00	Meredith J. Gussin	0	7	0	0	0	0	0	0	0
4/19/2023	Zoom conference with Mike Fitzgerald, Meredith Gussin and Sherri Fiske regarding acting as expert witness for damages. (0.5) Conferences with Meredith Gussin in preparation for next week's depositions of the McNaes. (1.8) Reviewing McNae productions in support of next week's depositions. (1.5)	3.8	550	\$2,090.00	Peter E Berlowe	3.8	0	0	0	0	0	0	0	0
4/18/2023	Prepare for deposition of Ronda McNae (4.5)	4.5	500	\$2,250.00	Meredith J. Gussin	0	4.5	0	0	0	0	0	0	0
4/18/2023	Reviewing Defendant document production to pull documents for use in Defendant's deposition next week. (2.9)	2.9	550	\$1,595.00	Peter E Berlowe	2.9	0	0	0	0	0	0	0	0
4/17/2023	Prepare for depositions of Ronda and Will McNae. (6.1)	6.1	500	\$3,050.00	Meredith J. Gussin	0	6.1	0	0	0	0	0	0	0
4/17/2023	Review transcript from discovery hearing regarding Will McNae's comments on Will's mental health issues. (0.6) Review draft of Second Supplemental Initial Disclosures. (0.3) Reviewing Ronda McNae production for documentation related to her desire for fame and fortune. (1.2) Working with Meredith Gussin in preparation for Will and Ronda McNae Depositions. (1.4)	3.7	550	\$2,035.00	Peter E Berlowe	3.7	0	0	0	0	0	0	0	0
4/16/2023	Prepare for depositions of Ronda and Will McNae. (2.6)	2.6	500	\$1,300.00	Meredith J. Gussin	0	2.6	0	0	0	0	0	0	0
4/14/2023	Deposition of Lily Vasquez; (1.2) review additional production by Will McNae; (2.0) telephone call with attorney for family seeking restraining order against Ronda McNae. (1.3)	4.5	500	\$2,250.00	Meredith J. Gussin	0	4.5	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
4/14/2023	Attend deposition of Lily Vasquez. (1.2) Reviewing Will McNae document production from yesterday. Continue preparing Vasquez deposition. (1.8) Attend Lily Vasquez deposition with Meredith Gussin. (1.2) Conference with Meredith Gussin after Vasquez deposition to discuss its import to the case and upcoming defendant depositions. (1.1) Emails with case team regarding Azaiah and Marissa Carew depositions. (0.3)	4.4	550	\$2,420.00	Peter E Berlowe	4.4	0	0	0	0	0	0	0	0
4/13/2023	Preparing for Lily Vasquez deposition with Meredith Gussin. (2.2) Reviewing case documents in support of Lily Vasquez deposition. (1.3) Cursory review of new Will McNae production. (0.7)	4.2	550	\$2,310.00	Peter E Berlowe	4.2	0	0	0	0	0	0	0	0
4/12/2023	Attend Deposition of Yelany de Varona. (11.8)	11.8	500	\$5,900.00	Meredith J. Gussin	0	11.8	0	0	0	0	0	0	0
4/12/2023	Prepare for and Attend deposition of Yelany De Varona. (11.1) Emails with court reporter from discovery hearing. (0.2)	11.3	550	\$6,215.00	Peter E Berlowe	11.3	0	0	0	0	0	0	0	0
4/11/2023	Prepare for deposition of Yelany; (4.2) telephone conference with Azaiah and Bella Carew; (1.2) review court filings regarding restraining order against Ronda. (0.7)	6.1	500	\$3,050.00	Meredith J. Gussin	0	6.1	0	0	0	0	0	0	0
4/11/2023	Conference with Yelany De Varona and Meredith Gussin to prepare for tomorrow's deposition. (5.6)	5.6	550	\$3,080.00	Peter E Berlowe	5.6	0	0	0	0	0	0	0	0
4/10/2023	Prepare for depositions; (3.3) review all documents produced. (1.4)	4.7	500	\$2,350.00	Meredith J. Gussin	0	4.7	0	0	0	0	0	0	0
4/10/2023	Working with Meredith Gussin in preparation for the Yelany De Varona Deposition. (3.2) Review notice of subpoena for Dr. Andrade. (0.2) Following up on request for dates for Ella McNae Deposition. (0.2) Emails with damages expert. (0.2) Review notices of deposition duces tecum for Marissa Carew and Azaiah Carew. (0.1)	3.9	550	\$2,145.00	Peter E Berlowe	3.9	0	0	0	0	0	0	0	0
4/9/2023	Prepare for all upcoming depositions. (4.3)	4.3	500	\$2,150.00	Meredith J. Gussin	0	4.3	0	0	0	0	0	0	0
4/7/2023	Strategy meeting with PEB and MG to discuss remaining witnesses, Rule 35 possible reconsideration motion, and deposition of Will McNae. (3.0)	3	400	\$1,200.00	Francisco J. Barreto	0	0	0	0	3	0	0	0	0
4/7/2023	Review documents in preparation for Will, Ronda and Yelany's depositions. (5.2)	5.2	500	\$2,600.00	Meredith J. Gussin	0	5.2	0	0	0	0	0	0	0
4/7/2023	Legal research on nominal offers of judgment to determine if the two OJ's received Friday are capable of being accepted/valid. (1.2) Draft email to Yelany De Varona regarding the offers of judgment received. (0.3) Reviewing case documents to help prepare Yelany De Varona for her deposition. (1.8) Emails with court reporter assigned to transcribe the transcript of the discovery hearing. (0.2) Review Ronda McNae Supplement response to document requests, supplement documents and supplemental responses to first set of interrogatories. (1.1) Reviewing documents to prepare Yelany De Varona for her deposition.	4.6	550	\$2,530.00	Peter E Berlowe	4.6	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
4/6/2023	Emails with Meredith Gussin regarding asking Will McNae about the psychology words he uses in writing, and whether Ronda McNae is actually the author of those documents. (0.4) Conference with Meredith Gussin on case issues regarding upcoming depositions and deposing other witnesses. (0.7) Review additional joint discovery sets served today upon Plaintiffs from Defendants. (0.3) Review notice of issuance of subpoenas to Kentaro and Persefoni. (0.3) Review proposals for settlement received from the McNae's to Yelany De Varona. (0.4) Reviewing McNae documents in support of upcoming depositions. (1.8)	3.9	550	\$2,145.00	Peter E Berlowe	3.9	0	0	0	0	0	0	0	0
4/5/2023	Attend hearing on motion to compel mental health records of Will McNae; (1.8) depo prep. (2.3)	4.1	500	\$2,050.00	Meredith J. Gussin	0	4.1	0	0	0	0	0	0	0
4/5/2023	Review Abigail Leonard declaration. (0.3) Emails from opposing counsel regarding hearing later today. (0.75) Emails from opposing counsel on setting the depositions of Azaiah Carew, Marissa Carew, and Abigail Leonard. (0.2) Review minute entries from Judge Becerra. (0.2) Conference with Meredith Gussin on what happened at today's discovery hearing with Magistrate Becerra. (0.3) Review status update to clients regarding today's hearing. (0.2) Reviewing McNae Production in preparation for Defendants' depositions. (1.85)	3.3	550	\$1,815.00	Peter E Berlowe	3.3	0	0	0	0	0	0	0	0
4/4/2023	Zoom call with client and PEB re status of case; (0.45) prepare for hearing on motion to compel; (2.0) revise and edit and notice all statements by third parties. (0.35)	2.8	500	\$1,400.00	Meredith J. Gussin	0	2.8	0	0	0	0	0	0	0
4/4/2023	Review notice of discovery hearing set by judge. (0.1) Zoom conference with Meredith Gussin and Clients on case issues. (0.5) Review case law cited to by Will McNae's counsel regarding discovery hearing. (0.3) Review and revise draft declaration of Marissa Carew. (0.2) Scheduling of Lily Vasquez deposition. Discuss Lily Vasquez deposition with Meredith Gussin. (0.3) Reviewing McNae documents related to Lily Vasquez. (1.6) Conference with Meredith Gussin in preparation for tomorrow's discovery hearing. (0.5)	3.8	550	\$2,090.00	Peter E Berlowe	3.8	0	0	0	0	0	0	0	0
4/3/2023	Prepare notice of hearing and all exhibits thereto; (0.4) legal research; (0.5) review FB memo re mental health records; (1.0) telephone call with Marisa Carew; (1.0) revise statement of Azaiah Carew. (0.5)	3	500	\$1,500.00	Meredith J. Gussin	0	3	0	0	0	0	0	0	0
4/3/2023	Review emails from weekend between counsel and Magistrate Becerra regarding discovery hearing. (0.3) Review and revise proposed declaration for Azaiah Carew. (0.3) Multiple conferences with Meredith Gussin regarding discovery hearing. (0.6) Review Notice of Discovery Dispute prepared by Meredith Gussin. (0.2) Review DSAR documents to be produced. (0.3) Reviewing McNae documents regarding discovery dispute. (1.2)	2.7	550	\$1,485.00	Peter E Berlowe	2.7	0	0	0	0	0	0	0	0
4/2/2023	Zoom conference to interview Azaiah Carew; (2.1) prepare and draft sworn declaration of same. (0.9)	3	500	\$1,500.00	Meredith J. Gussin	0	3	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
3/31/2023	Conduct research and prepare memo with argument for Meredith Gussin to use for preparation for hearing on Motion to Compel production of mental health records. (1.8)	1.8	400	\$720.00	Francisco J. Barreto	0	0	0	0	1.8	0	0	0	0
3/31/2023	Status call with PEB to discuss strategy to move to compel and argue psych records are discoverable. (0.2)	0.2	400	\$80.00	Francisco J. Barreto	0	0	0	0	0.2	0	0	0	0
3/31/2023	Draft declaration of Abigail Leonard; (1.0) conference with PEB to discuss status of case; (0.75) prepare for hearing on motion to compel disclosure of Will McNae mental health records. (1.25)	3	500	\$1,500.00	Meredith J. Gussin	0	3	0	0	0	0	0	0	0
3/31/2023	Emails and phone calls with Meredith Gussin regarding interviewing Azaiah Carew this weekend. (0.6) Emails with case team and opposing counsel regarding discovery of Will McNae's mental health records. (0.5) Conference with Meredith Gussin regarding her call with Abigail Leonard and declaration from Abigail Leonard. (0.4) Review text messages between Abigail Leonard and Azaiah Carew. (0.3) Receive Tom Wiper Deposition Transcript and forward to Mike Fitzgerald. (0.2) Review additional Will McNae documents received today. (1.4)	3.4	550	\$1,870.00	Peter E Berlowe	3.4	0	0	0	0	0	0	0	0
3/30/2023	File Joint Motion for Extension of Expert Witness Pretrial Deadlines; (0.4) legal research regarding issue governing Will McNae mental health records; (1.2) correspondence with opposing counsel regarding scheduling hearing re same; (0.2) review Azaiah Carew production; (0.6) telephone call with Azaiah Carew; (0.7) telephone conference with PEB to discuss same; (0.3) telephone call with Abby Leonard potential fact witness; (0.5) follow up with client re status of same. (0.3)	4.2	500	\$2,100.00	Meredith J. Gussin	0	4.2	0	0	0	0	0	0	0
3/30/2023	Review Order granting joint motion for extension of expert witness deadlines. (0.1) Continue reviewing Onsite production. (1.2) Emails with Meredith Gussin on recent Ronda McNae discovery responses and case strategy. (0.4) Call with Meredith Gussin on compelling Will McNae's mental health records. (0.3) Receive volume 2 of Mike Fitzgerald deposition and forward to him. (0.1) Review documents received from Azaiah Carew. (1.0)	3.1	550	\$1,705.00	Peter E Berlowe	3.1	0	0	0	0	0	0	0	0
3/29/2023	Prepare Joint Motion for Extension of Expert Witness Pretrial Deadlines; (0.35) review Onsite documents. (2.15)	2.5	500	\$1,250.00	Meredith J. Gussin	0	2.5	0	0	0	0	0	0	0
3/29/2023	Emails with Meredith Gussin regarding whether Ronda McNae is sharing attorneys eyes only documentation with police. (0.3) Work with case counsel on setting Lily Vasquez deposition. (0.2) Review Ronda McNae's answers to Yelany De Varona's first set of interrogatories. (0.25) Work with opposing counsel on joint motion for extension of expert witness deadlines. (0.2) Extensive call with Pat Dray regarding Ronda's recent activity with State Attorney. (0.4) Review Onsite documents and discuss with Meredith Gussin. (0.45)	1.8	550	\$990.00	Peter E Berlowe	1.8	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
3/28/2023	Strategy conference with Meredith Gussin to discuss motion to compel psych records of Will McNae and how to prepare argument to access the same. (0.3)	0.3	400	\$120.00	Francisco J. Barreto	0	0	0	0	0.3	0	0	0	0
3/28/2023	Correspondence with opposing counsel regarding outstanding and pending discovery issues. (1.1)	1.1	500	\$550.00	Meredith J. Gussin	0	1.1	0	0	0	0	0	0	0
3/28/2023	Review discovery from Jessica Sevilano. (0.25) Review documents from Sabrina Puglisi. (0.25) Forward same to Pat Dray. (0.1) Call with Pat Dray regarding same. (0.3) Review documents from Northwest University. (0.2) Emails to Meredith Gussin regarding whether Ronda McNae is giving attorneys eyes only information to the police. (1.0)	2.1	550	\$1,155.00	Peter E Berlowe	2.1	0	0	0	0	0	0	0	0
3/27/2023	Emails with Meredith on case strategy. (0.3) Review Ronda McNae Supplemental Production. (0.4) Emails with opposing counsel regarding Will McNae's mental health records. (0.2) Emails with opposing counsel regarding additional discovery they want from us and third parties who have not responded to subpoenas. (0.3) Follow-up on DSAR. (0.1) Reviewing McNae Document production. (1.5)	2.8	550	\$1,540.00	Peter E Berlowe	2.8	0	0	0	0	0	0	0	0
3/24/2023	Emails with case team regarding case issues and strategy. (0.3)	0.3	550	\$165.00	Peter E Berlowe	0.3	0	0	0	0	0	0	0	0
3/23/2023	Review of discovery documents submitted from Sabrina Puglisi regarding criminal investigation in Miami Beach; (1.8) analysis re mental health issue of Will McNae (0.4)	2.2	500	\$1,100.00	Meredith J. Gussin	0	2.2	0	0	0	0	0	0	0
3/23/2023	Emails with Meredith Gussin and opposing counsel regarding case issues. (0.4)	0.4	550	\$220.00	Peter E Berlowe	0.4	0	0	0	0	0	0	0	0
3/22/2023	Receive Fitzgerald deposition transcript, first volume, and forward to Mike Fitzgerald. (0.3) Emails with Meredith Gussin regarding DSAR issues. (0.3) Emails with Jenny Martinez that SoftwareOne internal review would not be in employment files of an employee. (0.2) Begin reviewing Ronda McNae Supplement production received today. (1.9) Emails with Phillip Landau. (0.2)	2.9	550	\$1,595.00	Peter E Berlowe	2.9	0	0	0	0	0	0	0	0
3/21/2023	Emails with case team on deposition scheduling. (0.3) Conference with Meredith Gussin regarding new documents from Will McNae. Reviewing Ronda McNae Documents. (1.4)	1.7	550	\$935.00	Peter E Berlowe	1.7	0	0	0	0	0	0	0	0
3/20/2023	Email from Jenny Martinez regarding SoftwareOne internal review and their assertion of privilege. (0.2) Phone call with Stephanie Casey regarding possibility of settling case. (0.25) Email to Mike Fitzgerald regarding same. (0.2) Review additional Will McNae document production received today. (2.55)	3.2	550	\$1,760.00	Peter E Berlowe	3.2	0	0	0	0	0	0	0	0
3/17/2023	Attend conference with opposing counsel to discuss pending discovery matters; (0.4) phone call with PEB to discuss case strategy and issue regarding mental health of W. McNae; (0.8) review statements re allegations of same. (1.0)	2.2	500	\$1,100.00	Meredith J. Gussin	0	2.2	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
3/17/2023	Review amended deposition notice for Yelany. (0.2) Listen to phone call recordings made by Ronda McNae and additional document production. (2.4) Conference with Meredith Gussin regarding Will McNae defamatory statements and their reference to his mental health. (0.8)	3.4	550	\$1,870.00	Peter E Berlowe	3.4	0	0	0	0	0	0	0	0
3/16/2023	Prepare for meeting to confer with opposing counsel to discuss pending discovery; (1.2) prepare Fitzgerald's response to Will McNae's second Request for Production; (1.8) review Ronda McNae's supplemental production and voice recordings; (1.7) trial strategy. (0.4)	5.1	500	\$2,550.00	Meredith J. Gussin	0	5.1	0	0	0	0	0	0	0
3/16/2023	Emails between counsel for scheduling depositions of Will and Ronda McNae. (0.25) Emails with Meredith Gussin regarding documents Mike Fitzgerald has been able to retrieve regarding pay and other issues involving SoftwareOne. (0.65) Work with Meredith Gussin on additional Fitzgerald production. (1.8)	2.7	550	\$1,485.00	Peter E Berlowe	2.7	0	0	0	0	0	0	0	0
3/15/2023	Multiple communication regarding pending discovery items; (0.8) correspondence with expert witness; (0.5) review draft of expert witness report; (0.8) prepare response to Will RFP of documents. (1.3)	3.4	500	\$1,700.00	Meredith J. Gussin	0	3.4	0	0	0	0	0	0	0
3/15/2023	Emails with Phillip Landau. (0.2) Scheduling deposition preparation for Yelany De Varona with Meredith Gussin. (0.2) Conference call with Meredith Gussin and Frank Barreto on case issues and strategy. (2.4) Emails to Jenny Martinez regarding SoftwareOne documents. (0.2) Email to Pat Dray regarding getting police records from their investigation. (0.1) Call with Pat Dray regarding same. (0.2) Begin reviewing draft reports from Michael DiTamasso. (0.1)	3.4	550	\$1,870.00	Peter E Berlowe	3.4	0	0	0	0	0	0	0	0
3/14/2023	Strategy conference via zoom with Meredith Gussin and Peter Berlowe discussing witnesses to depose, evidentiary issues needed to admit certain documents, and discussing how to weave certain documents into case in chief, among other issues posed in the case. (2.9)	2.9	400	\$1,160.00	Francisco J. Barreto	0	0	0	0	2.9	0	0	0	0
3/14/2023	Telephone conference with Peter, Frank to discuss strategy going forward; (2.4)multiple correspondence with opposing counsel regarding pending discovery issues; (0.2) prepare for meet and confer. (0.4)	3	500	\$1,500.00	Meredith J. Gussin	0	3	0	0	0	0	0	0	0
3/14/2023	Case strategy conference with Meredith Gussin. (0.4) Emails with Court Reporter regarding deposition exhibits for Tom Wiper deposition and Mike Fitzgerald deposition. (0.3) Emails with opposing counsel regarding documents from SoftwareOne. (0.2) Reviewing document production from the McNaes. (2.6)	3.5	550	\$1,925.00	Peter E Berlowe	3.5	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
3/13/2023	Review amended notice of deposition for Yelany De Varona. (0.2) Scheduling preparation session for Yelany De Varona with Meredith Gussin. (0.2) Emails with case counsel regarding outstanding discovery issues. (0.2) Reviewing Will and Ronda McNae Documents. (1.9) Phone conference with Meredith Gussin on additional deposition witnesses. (0.4) Review Ronda McNae's response to second request for production of documents received today. (0.85)	3.75	550	\$2,062.50	Peter E Berlowe	3.75		0	0	0	0	0	0	0
3/10/2023	Deposition of Tom Wiper; (2.0) continued deposition of M. Fitzgerald. (7.0)	9	500	\$4,500.00	Meredith J. Gussin	0	9	0	0	0	0	0	0	0
3/10/2023	Prepare for and attend Tom Wiper deposition. (2.4) Conference with Meredith Gussin after Tom Wiper deposition. (1.3) Reviewing Will and Ronda McNae documents. (0.9) Emails with case counsel regarding outstanding discovery. (0.2)	4.8	550	\$2,640.00	Peter E Berlowe	4.8		0	0	0	0	0	0	0
3/9/2023	Review documents produced by Will McNae; prepare for deposition of Tom Wiper; (2.1) prepare for deposition of Mike; (0.6) review and prepare documents to use as exhibits to deposition. (0.6)	3.3	500	\$1,650.00	Meredith J. Gussin	0	3.3	0	0	0	0	0	0	0
3/9/2023	Receive copies of Mike Fitzgerald Deposition Exhibits from Court Reporter. (0.1) Reviewing Ronda McNae Documents. (2.1) Emails with Meredith Gussin regarding outstanding discovery issues and other case issues. (0.2) cursory review of Will McNae Documents. (1.1) Prepare for Tom Wiper deposition. (0.8)	4.3	550	\$2,365.00	Peter E Berlowe	4.3		0	0	0	0	0	0	0
3/8/2023	Zoom conference with Tom Wiper to prepare for deposition; (1.2) draft list of questions for Tom Wiper deposition; (0.7) revise list of questions for Mike Fitzgerald deposition; (0.4) finalize MF and YDV responses to Will McNae's requests for production; (0.7) review Will's response to MF request for production; (0.2) correspondence with opposing counsel; (0.1) review Software ONE correspondence and prepare same for production. (0.2)	3.5	500	\$1,750.00	Meredith J. Gussin	0	3.5	0	0	0	0	0	0	0
3/8/2023	Conference with Meredith Gussin regarding preparations for Tom Wiper preparation session and deposition. (0.7) Emails with Meredith Gussin regarding additional documents from Mike Fitzgerald. (0.2) Zoom conference with Tom Wiper and Meredith Gussin to prepare him for his deposition. (1.2) Reviewing additional Ronda McNae documents. (3.3) Emails with Meredith Gussin regarding outstanding discovery issues. (0.3)	5.7	550	\$3,135.00	Peter E Berlowe	5.7		0	0	0	0	0	0	0
3/7/2023	Emails with Meredith Gussin and Mike Fitzgerald regarding SoftwareOne related document production. (0.4) Reviewing Ronda McNae documents. (2.8)	3.2	550	\$1,760.00	Peter E Berlowe	3.2		0	0	0	0	0	0	0
3/6/2023	Review additional documents; (0.5) correspond with opposing counsel; (0.2) correspondence with Dr. DiTomaso (0.3)	1	500	\$500.00	Meredith J. Gussin	0	1	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
3/6/2023	Review emails between case counsel from this weekend. (0.2) Review notice of continued deposition of Mike Fitzgerald. (0.1) Emails and phone call with Pat Dray regarding documents between him and Tom Wiper, Yelany, and the State Attorney's Office. (0.6) Emails and phone call with Meredith Gussin on case issues. (0.4) Review Ronda McNae Documents. (2.1)	3.4	550	\$1,870.00	Peter E Berlowe	3.4	0	0	0	0	0	0	0	0
3/5/2023	Create outline for continuation of MF deposition. (1.0)	1	500	\$500.00	Meredith J. Gussin	0	1	0	0	0	0	0	0	0
3/3/2023	Deposition of M. Fitzgerald. (9.6)	9.6	500	\$4,800.00	Meredith J. Gussin	0	9.6	0	0	0	0	0	0	0
3/3/2023	Attending Deposition of Mike Fitzgerald. (9.4) Cursory Review of Ronda McNae supplemental production. (0.2)	9.5	550	\$5,225.00	Peter E Berlowe	9.5	0	0	0	0	0	0	0	0
3/2/2023	Meet with client and Peter Berlowe to prepare for deposition of M. Fitzgerald. (7.0)	7	500	\$3,500.00	Meredith J. Gussin	0	7	0	0	0	0	0	0	0
3/2/2023	Conference with Meredith Gussin and Mike Fitzgerald in preparation for tomorrow's deposition. (7.0) Reviewing additional Ronda McNae Documents. (0.35) Emails with Meredith Gussin regarding same. (0.2) Review SoftwareOne executed settlement received today. (0.2) Begin reviewing texts between Ronda McNae and Patrice Sanchez received today. (0.3) Emails with opposing counsel and Meredith Gussin regarding outstanding discovery. (0.2)	8.25	550	\$4,537.50	Peter E Berlowe	8.25	0	0	0	0	0	0	0	0
3/1/2023	Emails with case team and opposing counsel regarding outstanding discovery. (0.2) Reviewing additional Ronda McNae Documents. (1.8) Emails and phone calls with Meredith Gussin regarding same. (0.4)	2.4	550	\$1,320.00	Peter E Berlowe	2.4	0	0	0	0	0	0	0	0
2/28/2023	Review supplemental production from Ronda McNae. (2.6) Review recorded conversation of Mike Fitzgerald received today from Ronda McNae. (0.5) Multiple calls with Meredith Gussin regarding today's production received from Ronda McNae and deposition preparation for Mike Fitzgerald. (1.2)	4.3	550	\$2,365.00	Peter E Berlowe	4.3	0	0	0	0	0	0	0	0
2/28/2023	Continue developing case strategy; (2.2) discuss legal and factual issues with PEB; (1.2) revise subpoena for Northwest University, Azaiah Carew; (0.3) analysis of witnesses to pursue. (1.1)	4.8	500	\$2,400.00	Meredith J. Gussin	0	4.8	0	0	0	0	0	0	0
2/27/2023	Conference calls and emails with Meredith Gussin regarding interrogatories to serve upon Ronda McNae, as well as issues to prepare Mike Fitzgerald for his deposition. (1.1) Review documents from Ronda McNae that contradict statements she has made in the case. (2.1)	3.2	550	\$1,760.00	Peter E Berlowe	3.2	0	0	0	0	0	0	0	0
2/27/2023	Prepare for deposition of M. Fitzgerald; (4.3) review documents; (1.1) review additional documents produced by R. McNae; (0.4) draft discovery; (0.2) listen to recordings from R. McNae. (0.2)	6.2	500	\$3,100.00	Meredith J. Gussin	0	6.2	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
2/24/2023	Reviewing Ronda McNae production. (2.1) Attend zoom status conference with Meredith Gussin and clients. (1.5) Review McNae's subpoena to additional witnesses. (0.3) Review reply in support of motion to dismiss. (0.4)	4.3	550	\$2,365.00	Peter E Berlowe	4.3	0	0	0	0	0	0	0	0
2/23/2023	Prepare Fitzgerald's response to Will's First and Second Request for production of documents; (0.7) Prepare de Varona's responses to Will's Firsts Request for Production; (0.6) review our pending document requests to Will and Ronda; (0.5) prepare De Varona's first set of interrogatories to Ronda; (0.8) correspondence to clients in advance of meeting; (0.2) review pending notes and to do list. (0.3)	3.1	500	\$1,550.00	Meredith J. Gussin	0	3.1	0	0	0	0	0	0	0
2/23/2023	Reviewing Ronda McNae document production. (1.8) Review Meredith Gussin's agenda for tomorrow's client status conference. (0.4)	2.2	550	\$1,210.00	Peter E Berlowe	2.2	0	0	0	0	0	0	0	0
2/22/2023	Email correspondence with clients regarding information needed; (0.2) telephone call with Steve Werth attorney for Ali Sametti; (0.3) telephone call with Jessica Bergman Sevillano, (0.4) review Vita Health documents; (0.3) prepare Request for Admissions. (0.6)	1.8	500	\$900.00	Meredith J. Gussin	0	1.8	0	0	0	0	0	0	0
2/22/2023	Reviewing Ronda McNae Document production. (1.9) Review treatment notes provided by Mike Fitzgerald. (0.7) Emails from opposing counsel on what they say is outstanding discovery. (0.2) Review initial disclosure information received from Yelany De Varona. (0.3)	3.1	550	\$1,705.00	Peter E Berlowe	3.1	0	0	0	0	0	0	0	0
2/20/2023	Emails with Mike Fitzgerald and case team on having status conference at the end of the week. (0.3) Reviewing Ronda McNae document production. (3.4)	3.7	550	\$2,035.00	Peter E Berlowe	3.7	0	0	0	0	0	0	0	0
2/17/2023	Edit and finalize brief in opposition to motions to dismiss; (1.9) prepare and file exhibits thereto. (0.4)	2.3	500	\$1,150.00	Meredith J. Gussin	0	2.3	0	0	0	0	0	0	0
2/17/2023	Emails with Meredith Gussin and Francisco Barreto on case issues. (0.4) Reviewing McNae document production. (2.55) Reviewing Mike's HR File and discussing with Meredith Gussin. (0.5) Review Second Request for Production from Will McNae to Mike Fitzgerald received today. (0.3) Reviewing, revising, and finalizing response in opposition to motion to dismiss with Meredith Gussin. (1.5)	6.25	550	\$3,437.50	Peter E Berlowe	6.25	0	0	0	0	0	0	0	0
2/16/2023	Strategy conference call with Peter Berlowe and Meredith Gussin to discuss draft of response to Motion to Dismiss and strengthen certain portions of the arguments distinguishing subject matter jurisdiction and independent tort arguments. (1.4)	1.4	400	\$560.00	Francisco J. Barreto	0	0	0	0	1.4	0	0	0	0
2/16/2023	Continue to work on brief in opposition to motion to dismiss. (4.4)	4.4	500	\$2,200.00	Meredith J. Gussin	0	4.4	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
2/16/2023	Emails with Meredith Gussin and Francisco Barreto on case issues. (0.3) Calls and zoom conference with case team regarding response in opposition to motion to dismiss. (1.4) Reviewing McNae document production. (3.8)	5.5	550	\$3,025.00	Peter E Berlowe	5.5	0	0	0	0	0	0	0	0
2/15/2023	Revise, edit and continue drafting brief in opposition to Motions to Dismiss. (3.0)	3	500	\$1,500.00	Meredith J. Gussin	0	3	0	0	0	0	0	0	0
2/14/2023	Continue drafting response brief to Motions to Dismiss. (6.4)	6.4	500	\$3,200.00	Meredith J. Gussin	0	6.4	0	0	0	0	0	0	0
2/14/2023	Emails with Meredith Gussin and Francisco Barreto on case issues. (0.4) Reviewing McNae document production. (3.6) Reviewing and revising response in opposition to motion to dismiss. (1.1) Emails with opposing counsel regarding officially cancelling Yelany's deposition. (0.2) Conference with Meredith Gussin on Mike's employment file issues. (0.3) Review Will McNae Witness Subpoenas. (0.2)	5.8	550	\$3,190.00	Peter E Berlowe	5.8	0	0	0	0	0	0	0	0
2/13/2023	Conduct research necessary to develop body of case law defining the distinctions between defamation and disparagement as separate causes of action for purposes of defeating motion to dismiss on independent tort doctrine. (1.2)	1.2	400	\$480.00	Francisco J. Barreto	0	0	0	0	1.2	0	0	0	0
2/13/2023	Legal research and analysis of issues raised in Consolidated Motions to Dismiss; (3.6) begin drafting response brief; (4.0) telephone call with counsel for Ali Semit. (0.4) Review correspondence from opposing counsel. (0.2)	8.2	500	\$4,100.00	Meredith J. Gussin	0	8.2	0	0	0	0	0	0	0
2/13/2023	Emails with Meredith Gussin and Francisco Barreto on case issues. (0.3) Reviewing McNae document production. (2.9) Review Francisco Barreto's recent research on comparison of defamation to disparagement. (0.5) Review declaration for Mike to sign regarding domicile. (0.4) Work with Meredith Gussin on issues related to response to motion to dismiss. (1.1)	5.2	550	\$2,860.00	Peter E Berlowe	5.2	0	0	0	0	0	0	0	0
2/10/2023	Research and review FL standards and case law regarding specific damages models for each count in the Complaint for purposes of developing strategy and case valuation. (2.0)	2	400	\$800.00	Francisco J. Barreto	0	0	0	0	2	0	0	0	0
2/10/2023	Finalize Yelany and Mike's responses to discovery; (0.8) draft discovery to Will. (1.4)	2.2	500	\$1,100.00	Meredith J. Gussin	0	2.2	0	0	0	0	0	0	0
2/10/2023	Emails with Meredith Gussin on case issues. (0.3) Reviewing McNae document production. (2.25) Working with Meredith Gussin on Yelany's initial disclosures. (0.4) Emails with case team on service of subpoena's on out of state witnesses. (0.5) Review Francisco Barreto's memorandum on types of damages awardable under contract versus defamation, in conjunction with independent tort doctrine argument in motion to dismiss. (0.4) Review Mike's draft answers to 3rd set of interrogatories. (1.0)	4.65	550	\$2,557.50	Peter E Berlowe	4.65	0	0	0	0	0	0	0	0
2/9/2023	Review of Federal Rule 35 to determine if compulsory medical examination for psychology is appropriate for our case. (0.2)	0.2	400	\$80.00	Francisco J. Barreto	0	0	0	0	0.2	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
2/9/2023	Conduct strategy zoom conference with PEB and MG regarding motion to dismiss and response, Rule 35 motion viability, deposition preparation and important documents to show witnesses, and develop angle of attack on potential counterclaim from McNae. (2.2)	2.2	400	\$880.00	Francisco J. Barreto	0	0	0	0	2.2	0	0	0	0
2/9/2023	Work on discovery requests and responses; conference call with PEB and Francisco Baretta to discuss strategy going forward including comprehensive medical examination, issues in motion to dismiss, etc.; (2.2) review of text messages between Fitzgerald and Defendant R. McNae. (2.0)	4.2	500	\$2,100.00	Meredith J. Gussin	0	4.2	0	0	0	0	0	0	0
2/9/2023	Emails with Meredith Gussin on case issues. (0.1) Reviewing McNae document production. (0.1) Review second half of David Carpenter Deposition. (0.5) Review draft discovery responses from Mike Fitzgerald. (1.1) Work with Meredith Gussin on finalizing Yelany's responses to discovery. (0.2) Emails with case team on psychological examination on Ronda McNae. (0.9) Status conference with Meredith Gussin and Francisco Barreto on case issues. (2.2)	4.5	550	\$2,475.00	Peter E Berlowe	4.5	0	0	0	0	0	0	0	0
2/8/2023	Prepare Second Request for production of documents on Ronda; (0.7) Prepare First Request for Production of documents on will; (0.8) serve same on opposing counsel; (0.2) review deposition transcript of David Carpenter. (0.5)	2.2	500	\$1,100.00	Meredith J. Gussin	0	2.2	0	0	0	0	0	0	0
2/8/2023	Emails with Meredith Gussin on case issues. (0.3) Reviewing McNae document production. (2.4) Working with Meredith Gussin on our responses to discovery. (0.3) Working with case team on witness subpoena issues. (0.4) Work with Meredith Gussin on revising requests for production to both McNaes served today. (0.8) Review first half of David Carpenter Deposition. (0.4)	4.6	550	\$2,530.00	Peter E Berlowe	4.6	0	0	0	0	0	0	0	0
2/7/2023	Prepare answers to Defendant's requests for production to Yelany; (0.8) first set of interrogatories to Yelany; (0.9) 3rd set of interrogatories to Mike and second Request for Production of documents to Mike; (0.9) prepare draft of Yelany's initial disclosures; (0.7) review Will McNae's initial disclosures and discovery requests. (0.3)	3.6	500	\$1,800.00	Meredith J. Gussin	0	3.6	0	0	0	0	0	0	0
2/7/2023	Reviewing McNae document production. (2.4) Emails and calls with Meredith Gussin regarding same and other case issues. (1.2) Review and revise discovery responses for Yelany De Varona. (0.6)	4.2	550	\$2,310.00	Peter E Berlowe	4.2	0	0	0	0	0	0	0	0
2/6/2023	Receive and review Will McNae's first Request for Production to Mike Fitzgerald and Yelany De Varona. (0.4) Forward same to clients. (0.1) Reviewing document production. (1.9)	2.4	550	\$1,320.00	Peter E Berlowe	2.4	0	0	0	0	0	0	0	0
2/3/2023	Reviewing McNae documents. (2.3)	2.3	550	\$1,265.00	Peter E Berlowe	2.3	0	0	0	0	0	0	0	0
2/2/2023	Emails with Dr. Di Tommaso regarding case issues. (0.3) Reviewing document production from McNae. (1.8)	2.1	550	\$1,155.00	Peter E Berlowe	2.1	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
2/1/2023	Call with PEB, Yelany and Mike to discuss pending issues including matters raised in Motion to Dismiss; (1.0) legal research regarding independent tort doctrine issues; (0.7) prepare motion for extension of time to respond to Motion to Dismiss and proposed order granting same; (0.4) prepare notice of unavailability. (0.1)	2.2	500	\$1,100.00	Meredith J. Gussin	0	2.2	0	0	0	0	0	0	0
2/1/2023	Zoom Conference with Meredith Gussin, Mike Fitzgerald and Yelany De Varona regarding employment case, motion to dismiss issues, and expert witness issues. (1.0) Emails with Meredith Gussin regarding expert issues and motion to dismiss. (0.4)	1.4	550	\$770.00	Peter E Berlowe	1.4	0	0	0	0	0	0	0	0
1/31/2023	Work on response to Motion to Dismiss Amended Complaint; call with PEB to discuss issue raised therein. (0.7)	2.6	500	\$1,300.00	Meredith J. Gussin	0	2.6	0	0	0	0	0	0	0
1/31/2023	Extensive zoom conference with Meredith Gussin regarding arguments raise by motion to dismiss. Legal research regarding same. (1.9)	3.2	550	\$1,760.00	Peter E Berlowe	3.2	0	0	0	0	0	0	0	0
1/30/2023	Telephone call with Yelany De Varona to discuss discovery responses; (0.9) Finalize Fitzgerald's responses to Second RFP and Second Set of Interrogatories and serve same on opposing counsel. (0.7)	1.6	500	\$800.00	Meredith J. Gussin	0	1.6	0	0	0	0	0	0	0
1/30/2023	Final review of Yelany's discovery responses before service. (0.4) Zoom conference with Meredith Gussin regarding case issues. (0.3) Review SoftwareOne revised employment agreement forwarded by Mike Fitzgerald. (0.2) Comment on same. (0.3) Reviewing Ronda McNae Production. (0.8)	2	550	\$1,100.00	Peter E Berlowe	2	0	0	0	0	0	0	0	0
1/27/2023	Review Defendants' Motion to Dismiss With Prejudice. (0.8)	0.8	500	\$400.00	Meredith J. Gussin	0	0.8	0	0	0	0	0	0	0
1/27/2023	Review Microsoft production received today from Ronda McNae's counsel. (1.9) Review Motion to Dismiss jointly filed by the McNae's and note issues to discuss with Meredith Gussin. (0.6) Forward motion to Mike and Yelany. (0.1) Emails with Court Reporter from David Carpenter deposition. (0.2)	2.8	550	\$1,540.00	Peter E Berlowe	2.8	0	0	0	0	0	0	0	0
1/26/2023	Prepare subpoenas for documents from Sirena Herd, Azaiah Carew, Tami Wakasugi, Ali Sametti. (1.0)	1	500	\$500.00	Meredith J. Gussin	0	1	0	0	0	0	0	0	0
1/26/2023	Deposition of David Carpenter. (2.4)	2.4	500	\$1,200.00	Meredith J. Gussin	0	2.4	0	0	0	0	0	0	0
1/26/2023	Emails with opposing counsel regarding their having obtained document production from Microsoft yesterday. (0.3) Conference with Meredith Gussin regarding emails for Sirena Herd, Ali Sametti, Tami Wakasugi, and Azaiah Carew. (1.0) Telephone conference with Meredith Gussin regarding David Carpenter's deposition. (0.8)	2.1	550	\$1,155.00	Peter E Berlowe	2.1	0	0	0	0	0	0	0	0
1/25/2023	Prepare for deposition of D. Carpenter; (1.1) telephone conference with PEB re same; (0.4) prepare responses to interrogatories and RFP to Yaleny; (0.7) prepare initial disclosures. (0.6)	2.8	500	\$1,400.00	Meredith J. Gussin	0	2.8	0	0	0	0	0	0	0
1/25/2023	Emails with case team and David Carpenter's attorney regarding Carpenter's video deposition. (0.35) Review and revise first draft of discovery responses for Yelany De Varona. (0.9)	1.25	550	\$687.50	Peter E Berlowe	1.25	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
1/24/2023	Prepare for David Carpenter's deposition; (0.6) prepare deposition outline; (0.7) review correspondence, court file regarding petition filed by Will against David Carpenter; (0.25) correspondence with counsel in advance of same; (0.25) prepare shell of Yelany's response to Ronda's first RFP. (0.7)	2.5	500	\$1,250.00	Meredith J. Gussin	0	2.5	0	0	0	0	0	0	0
1/24/2023	Review cross notice of Yelany De Varona's deposition. (0.1) Emails regarding Mike Fitzgerald's counseling records. (0.2) Call with Meredith Gussin regarding David Carpenter Deposition. (0.3) Emails with attorney for David Carpenter. (0.2) Phone conference with Meredith Gussin on case strategy. (0.5)	1.3	550	\$715.00	Peter E Berlowe	1.3	0	0	0	0	0	0	0	0
1/23/2023	Review and revise deposition outline for David Carpenter deposition. (0.4) Conference call with Meredith Gussin regarding same. (0.9) Review amended notice of deposition for Yelany De Varona. (0.2)	1.5	550	\$825.00	Peter E Berlowe	1.5	0	0	0	0	0	0	0	0
1/20/2023	Prepare responses to Defendant's Second Set of Interrogatories and Second Request for Production; (0.9) review Defendant's Third Set of Interrogatories and First Set of Interrogatories and First Request for Production of Documents to Yelany; (0.4) correspondence with opposing counsel; (0.1) draft correspondence to Patrice Sanchez. (0.2)	1.6	500	\$800.00	Meredith J. Gussin	0	1.6	0	0	0	0	0	0	0
1/20/2023	Phone conference with Meredith Gussin regarding reaching out to Patrice Sanchez by email and other case issues. (0.6) Review and revise email to Patrice Sanchez. (0.3) Emails with Meredith Gussin regarding letters rogatory to SoftwareOne. (0.2) Emails with opposing counsel regarding discovery issues. (0.2) Review and revise draft discovery responses. (1.1) Review SoftwareOne Development Reports forwarded by Mike Fitzgerald. (0.5)	2.9	550	\$1,595.00	Peter E Berlowe	2.9	0	0	0	0	0	0	0	0
1/19/2023	Meeting with client, PEB, expert witness. (5.0)	5	500	\$2,500.00	Meredith J. Gussin	0	5	0	0	0	0	0	0	0
1/19/2023	Emails and phone calls with Meredith Gussin on case strategy. (0.3) Email from Mike Fitzgerald regarding counseling related documents. (0.2) Conference with Mike Fitzgerald and Meredith Gussin. (0.6) Conference with Mike Fitzgerald, Dr. DiTomaso, and Meredith Gussin. (3.0)	4.1	550	\$2,255.00	Peter E Berlowe	4.1	0	0	0	0	0	0	0	0
1/18/2023	Emails among case team and Tom Wiper and Mike Fitzgerald regarding their depositions and depo prep. (0.4) Reviewing Ronda McNae production. (1.5)	1.9	550	\$1,045.00	Peter E Berlowe	1.9	0	0	0	0	0	0	0	0
1/17/2023	Review supplemental responses to interrogatories and request for production; (0.5) review communication between defendant and Yelany; (0.7) discuss preparation for David Carpenter depo; (0.3) communicate with expert witness. (0.2)	1.7	500	\$850.00	Meredith J. Gussin	0	1.7	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
1/17/2023	Scheduling of deposition preparation for Mike Fitzgerald. (0.3) Emails with Meredith Gussin regarding Tom Wiper deposition. (0.2) Phone conference with Meredith Gussin regarding Ronda McNae's claim that she conspired with Yelany regarding the fake pregnancy. (0.5) Reviewing new discovery from Ronda McNae. (1.1) Emails with Meredith Gussin regarding Ronda McNae's "journals" referenced in other discover. (0.3) Emails with Meredith regarding McNae seeking letter's rogatory. (0.3)	2.7	550	\$1,485.00	Peter E Berlowe	2.7	0	0	0	0	0	0	0	0
1/16/2023	Review of all additional documents produced including journals, diaries, screen shot entries, Onsite documents; (2.1) index same; (0.5) correspondence with opposing counsel re same. (0.2)	2.8	500	\$1,400.00	Meredith J. Gussin	0	2.8	0	0	0	0	0	0	0
1/16/2023	Cursory review of Ronda McNae's supplemental responses to discovery. (0.35)	0.35	550	\$192.50	Peter E Berlowe	0.35	0	0	0	0	0	0	0	0
1/14/2023	Prepare correspondence regarding status of case to clients; (0.3) review documents produced by R. McNae. (0.5)	0.8	500	\$400.00	Meredith J. Gussin	0	0.8	0	0	0	0	0	0	0
1/13/2023	Review documents produced by Brook Weedman, therapist for R. McNae, review all additional documents produced by Defendant; (3.9) correspondence with counsel for W.McNae; (0.15) redjust deposition schedule. (0.25)	4.3	500	\$2,150.00	Meredith J. Gussin	0	4.3	0	0	0	0	0	0	0
1/13/2023	Review notice of appearance of counsel for Will McNae. (0.1) Background research on new counsel. (0.3) Email exchange with Will McNae's counsel. (0.3) Email with Mike Fitzgerald regarding Will McNae's counsel appearing in case. (0.25) Scheduling Mike Fitzgerald deposition. (0.2) Scheduling meeting with Dr. DiTomasso. (0.25) Extensive telephone conference with Meredith Gussin on case strategy. (1.4)	2.8	550	\$1,540.00	Peter E Berlowe	2.8	0	0	0	0	0	0	0	0
1/12/2023	Prepare documents for review by expert witness; (1.1) various correspondence with opposing counsel regarding deposition schedule, pending discovery disputes; (0.4) research issues regarding economic loss rule. (1.1)	2.6	500	\$1,300.00	Meredith J. Gussin	0	2.6	0	0	0	0	0	0	0
1/12/2023	Emails with case team and Mike Fitzgerald regarding prior counseling sessions. (0.4) Emails with case team regarding Tom Wiper deposition. (0.2) Extensive telephone conference with Meredith Gussin regarding case strategy. (0.5) Reviewing McNae production. (1.3) Review Order granting extension of time. (0.1)	2.5	550	\$1,375.00	Peter E Berlowe	2.5	0	0	0	0	0	0	0	0
1/11/2023	Prepare case for depositions; (0.6) review discovery and pending documents. (1.5)	2.1	500	\$1,050.00	Meredith J. Gussin	0	2.1	0	0	0	0	0	0	0
1/11/2023	Emails with case team regarding service on Sarah Dellinger. (0.3) Conference call with Meredith Gussin regarding Dr. DiTomasso. (0.3) Reviewing document production. (1.8) Cursory review of 3rd discovery set from Ronda McNae to Mike Fitzgerald. (0.2)	2.6	550	\$1,430.00	Peter E Berlowe	2.6	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
1/10/2023	Telephone call with client to discuss pending matters including responses due to Defendant's second request for production of documents; (1.8) review timelines; (0.3) review motion for extension of time and communicate with opposing counsel re same. (0.3)	2.4	500	\$1,200.00	Meredith J. Gussin	0	2.4	0	0	0	0	0	0	0
1/10/2023	Extensive phone conference with Meredith Gussin regarding case issues and strategy. (0.4) Review HIPPA forms for Mike to sign. (0.3) Emails with Meredith Gussin regarding Brock Weedman records. (0.3) Reviewing Ronda McNae Document production. (1.3)	2.3	550	\$1,265.00	Peter E Berlowe	2.3	0	0	0	0	0	0	0	0
1/9/2023	Prepare documents for Dr. DiTomasso; (0.3) set David Carpenter for deposition. (0.2)	0.5	500	\$250.00	Meredith J. Gussin	0	0.5	0	0	0	0	0	0	0
1/9/2023	Review HIPPA release from Ronda McNae's counsel. (0.2) Emails with Mike and Meredith regarding his responses to supplemental discovery. (0.3) Review deposition notice for Tom Wiper. (0.4) Reviewing Ronda McNae production documents.(1.5)	2.4	550	\$1,320.00	Peter E Berlowe	2.4	0	0	0	0	0	0	0	0
1/6/2023	Working with case team on noticing David Carpenter's deposition. (0.25) Reviewing McNae document production. (1.0)	1.25	550	\$687.50	Peter E Berlowe	1.25	0	0	0	0	0	0	0	0
1/5/2023	Emails with counsel for David Carpenter. (0.2) Emails with Meredith Gussin regarding her meet and confer with opposing counsel. (0.2) Emails with counsel for Ronda McNae about separate counsel being appointed for Will McNae. (0.2) Reviewing case documents. (1.5)	2.1	550	\$1,155.00	Peter E Berlowe	2.1	0	0	0	0	0	0	0	0
1/4/2023	Variaous correspondence with Alaina FW regarding follow up to meet and confer; (0.3) review documents. (0.5)	0.8	500	\$400.00	Meredith J. Gussin	0	0.8	0	0	0	0	0	0	0
1/4/2023	Emails with case team regarding strategy issues. (0.3) Review Yelany's production set of documents. (0.8) Review proposed joint motion to extend deadlines provided by opposing counsel. (0.7)	1.3	550	\$715.00	Peter E Berlowe	1.3	0	0	0	0	0	0	0	0
1/3/2023	Meet and Confer with Alaina FW regarding Defendant's answers to interrogatories and response to Plaintiff's Request for Production of Documents; (2.8) analysis regarding court scheduling deadlines; (0.6) review join motion to extend same. (0.1)	3.5	500	\$1,750.00	Meredith J. Gussin	0	3.5	0	0	0	0	0	0	0
1/3/2023	Emails to and from Meredith Gussin regarding Lily Vasquez, Tom Wiper, deposition notices, service of amended complaint upon Will McNae, marital privilege issues, and Yelany's deposition preparation. (1.3) Review order denying motion to dismiss as moot. (0.1) Emails with Tom Wiper. (0.2) Emails with opposing counsel on extensions of deadlines given amended complaint. (0.2) Emails with counsel for David Carpenter. (0.3) Call with Meredith Gussin regarding her meet and confer with McNae's counsel today. (1.7)	3.8	550	\$2,090.00	Peter E Berlowe	3.8	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
1/2/2023	Index all discovery to provide for Dr. DiTomaso, review all additional discovery documents produced by Ronda; (6.8) review and prepare discovery responses by Yelany de Varona to be provided to Ronda; (2.5) correspondence with opposing counsel, expert witness; (0.3) communicate with Alaina FW in preparation for meet and confer. (0.4)	10	500	\$5,000.00	Meredith J. Gussin	0	10	0	0	0	0	0	0	0
12/30/2022	Email to Mike Fitzgerald about Court granting our motion for leave to amend. (0.7) Emails with counsel for Ronda McNae regarding whether she will accept service of process on behalf of Will McNae. (0.2) Prepare Summons for Will and Ronda McNae to go with Amended Complaint. (0.3) File Amended Complaint and Summons separately per Judge Martinez's Order. (0.8) Forward Amendment and Summons to Mike Fitzgerald. (0.2)	2.2	550	\$1,210.00	Peter E Berlowe	2.2	0	0	0	0	0	0	0	0
12/29/2022	Emails with case team on service of witness subpoenas. (0.3) Review Order granting motion for leave to amend. (0.1) Review McNae's response in opposition to motion for leave to amend that was filed after our motion was granted. (0.8)	1.2	550	\$660.00	Peter E Berlowe	1.2	0	0	0	0	0	0	0	0
12/29/2022	Various correspondence with client, PEB, opposing counsel regarding scheduling depositions and meetings; (2.3) review Response in opposition to Motion for Leave to Amend; (0.6) review Court order granting leave to amend. (0.1)	3	500	\$1,500.00	Meredith J. Gussin	0	3	0	0	0	0	0	0	0
12/28/2022	Emails with case team and process servers regarding witness subpoenas. (0.4) Reviewing text messages received from Yelany De Varona. (1.8) Emails with Meredith Gussin and Mike Fitzgerald regarding same. (0.3) Telephone conference with Mike Fitzgerald regarding Yelany's text messages and other case strategy issues. (1.3)	3.8	550	\$2,090.00	Peter E Berlowe	3.8	0	0	0	0	0	0	0	0
12/27/2022	Emails with case team and process servers regarding inability to get witness subpoenas served. (0.6)	0.6	550	\$330.00	Peter E Berlowe	0.6	0	0	0	0	0	0	0	0
12/26/2022	Emails with opposing counsel regarding meet and confer and deposition of Yelany De Varona. (0.3)	0.3	550	\$165.00	Peter E Berlowe	0.3	0	0	0	0	0	0	0	0
12/23/2022	Emails with Meredith Gussin regarding retaining expert psychologist. (0.25) Emails with opposing counsel regarding requesting an extension of time regarding Yelany's document production. (0.15) Emails with case team regarding service of witness subpoenas. (0.3)	0.7	550	\$385.00	Peter E Berlowe	0.7	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
12/21/2022	Emails with Meredith Gussin regarding David Carpenter deposition and issues for her meet and confer regarding McNae's deficient discovery responses. (0.4) Emails with Yelany regarding her document production and the fact that her computer files were crashing. (0.3) Review some of the texts that were not crashing. (1.2)	1.9	550	\$1,045.00	Peter E Berlowe	1.9	0	0	0	0	0	0	0	0
12/20/2022	Emails with opposing counsel regarding meet and confer on Ronda McNae's deficient response to our discovery sets. (0.2) Emails with opposing counsel regarding why David Carpenter's deposition is relevant to the case. (0.55)	0.75	550	\$412.50	Peter E Berlowe	0.75	0	0	0	0	0	0	0	0
12/19/2022	Emails with Yelany De Verona regarding her documents responsive to the subpoena. (0.4) Review McNae's Second Supplemental Initial Disclosures. (0.4)	0.8	550	\$440.00	Peter E Berlowe	0.8	0	0	0	0	0	0	0	0
12/16/2022	Edit, revise and draft amended complaint; (2.1) finalize same; (0.3) file Motion for Leave to Amend with Court with Amended Complaint and Exhibits; (0.3) service on opposing counsel; (0.2) prepare subpoenas for Onsite and various other medical professionals; correspond with client. (0.4)	3.3	500	\$1,650.00	Meredith J. Gussin	0	3.3	0	0	0	0	0	0	0
12/16/2022	Emails with case team regarding process server's trouble serving Lily Vasquez. (0.3) Finalizing Amended Complaint and motion for leave to amend. (1.8) Emails with Jenny Martinez of SoftwareOne USA regarding not contacting Mr. Mays directly. (0.3) Confer with Meredith Gussin regarding subpoenas to Ronda McNae's medical providers. (0.4)	2.8	550	\$1,540.00	Peter E Berlowe	2.8	0	0	0	0	0	0	0	0
12/15/2022	Continue to draft amended complaint; (3.3) revise and edit same; (1.1) conference with PEB to discuss factual allegations, legal causes of action, review of documents to support causes of action. (0.8)	5.2	500	\$2,600.00	Meredith J. Gussin	0	5.2	0	0	0	0	0	0	0
12/15/2022	Emails with opposing counsel regarding Ronda McNae's missing text messages and Mike Fitzgerald's tax returns. (0.3) Emails with case team regarding serving Lily Vasquez. (0.5) Drafting and revising portions of amended complaint. (4.8)	5.6	550	\$3,080.00	Peter E Berlowe	5.6	0	0	0	0	0	0	0	0
12/14/2022	Work on amended complaint; (1.3) analysis of PEB comments; (0.7) legal research regarding defamation claims. (1.2)	3.2	500	\$1,600.00	Meredith J. Gussin	0	3.2	0	0	0	0	0	0	0
12/14/2022	Review client's tax returns. (0.25) Call with Mike Fitzgerald regarding case status and strategy. (0.4) Perform public records search on Lily Vasquez. (0.3) Emails with McNae's counsel regarding their intent to amend McNae's initial disclosures. (0.3)	1.25	550	\$687.50	Peter E Berlowe	1.25	0	0	0	0	0	0	0	0
12/13/2022	Revise, edit and assess causes of action in amended complaint; (3.39) telephone conference with client. (0.7)	4.09	500	\$2,045.00	Meredith J. Gussin	0	4.09	0	0	0	0	0	0	0
12/13/2022	Emails with Meredith Gussin regarding conferring with McNae's counsel regarding their deficient production. (0.9) Emails with case team regarding serving Lily Vasquez. (0.3)	1.2	550	\$660.00	Peter E Berlowe	1.2	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
12/12/2022	Work on revising amended complaint; (1.8) review subpoena; (0.2) review documents; (0.7) assess third parties to subpoena. (0.3)	3	500	\$1,500.00	Meredith J. Gussin	0	3	0	0	0	0	0	0	0
12/12/2022	Continue reviewing supplement production from McNae. (2.90) Review and revise motion for leave to amend. (0.4) Emails with Meredith Gussin regarding same. (0.4)	3.7	550	\$2,035.00	Peter E Berlowe	3.7	0	0	0	0	0	0	0	0
12/10/2022	Work on amended complaint; (2.0) draft motion for leave to amend to add additional causes of action and to join additional parties. (1.2)	3.2	500	\$1,600.00	Meredith J. Gussin	0	3.2	0	0	0	0	0	0	0
12/9/2022	call with peter and meredith to discuss amended complaint (3.0)	3	400	\$1,200.00	Francisco J. Barreto	0	0	0	0	3	0	0	0	0
12/9/2022	Legal research for causes of action to assert in amended complaint; (2.09) begin drafting amended complaint. (2.0)	4.09	500	\$2,045.00	Meredith J. Gussin	0	4.09	0	0	0	0	0	0	0
12/9/2022	Conferences with Meredith Gussin and Francisco Barreto regarding damages, motion for leave, and amendment of the complaint. (3.0) Drafting revisions to amended complaint. Review McNae's response to First Request for Production and First Set of Interrogatories. (1.0) Call with Mike Fitzgerald. (0.4) Begin reviewing supplemental production from McNae. (0.4)	5.2	550	\$2,860.00	Peter E Berlowe	5.2	0	0	0	0	0	0	0	0
12/8/2022	Review discovery deadlines; (0.1) legal research. (1.1)	1.2	500	\$600.00	Meredith J. Gussin	0	1.2	0	0	0	0	0	0	0
12/8/2022	Review and revise amended complaint. (0.6) Emails with Meredith Gussin regarding same. (0.3) Review and revise motion for leave to amend and add parties. (0.4) Call with Meredith Gussin regarding same. (0.9)	2.2	550	\$1,210.00	Peter E Berlowe	2.2	0	0	0	0	0	0	0	0
12/7/2022	Emails with Philip Landau. (0.15)	0.15	550	\$82.50	Peter E Berlowe	0.15	0	0	0	0	0	0	0	0
12/6/2022	Legal research in advance of Motion for Leave to amend complaint and to join additional parties; (0.8) Draft Motion for Leave to Amend and to Join Additional Parties; (0.8) correspondence with PEB re same; (0.3) review deadlines of upcoming discovery. (0.1)	2	500	\$1,000.00	Meredith J. Gussin	0	2	0	0	0	0	0	0	0
12/6/2022	Emails with Meredith Gussin regarding marital privilege issues. (0.25)	0.25	550	\$137.50	Peter E Berlowe	0.25	0	0	0	0	0	0	0	0
12/6/2022	Emails with Mike Fitzgerald regarding his retention of Phillip Landau as his employment counsel in the UK. (0.3) Emails with Philip Landau. (0.2)	0.5	550	\$275.00	Peter E Berlowe	0.5	0	0	0	0	0	0	0	0
12/5/2022	Legal research regarding moving to amend complaint; (0.8) prepare and issue subpoena for documents upon Lily Vasquez; (0.4) review McNae's subpoena's on Fitzgerald's doctors; (0.4) analysis of other information needed to determine other sources of information. (0.5)	2.1	500	\$1,050.00	Meredith J. Gussin	0	2.1	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
12/5/2022	Emails with case team regarding production of Fitzgerald employment agreement and service of the Lily Vasquez subpoena. (0.4) Review subpoenas for Fitzgerald Medical Providers. (0.3) Conference with Meredith Gussin regarding McNae's failure to identify what her listed witnesses will testify about. (0.3) Emails with opposing counsel and Meredith Gussin regarding opposing counsel's tantrum of certain people in her office not being served. (0.2) Emails with Meredith Gussin regarding martial privilege issues. (0.2) Conference with Meredith Gussin regarding amending complaint and motion in support. (0.3)	1.7	550	\$935.00	Peter E Berlowe	1.7	0	0	0	0	0	0	0	0
12/2/2022	Draft and edit Amended Complaint; (2.8) continue legal research regarding various causes of action and elements to assert for various claims; (0.8) Draft subpoena for Lily Vasquez. (0.4)	4	500	\$2,000.00	Meredith J. Gussin	0	4	0	0	0	0	0	0	0
12/2/2022	Emails with case team and opposing counsel regarding document referring to Lifespan Timeline. (0.4) Emails with case team over sending subpoena to Lily Vasquez. (0.3) Review protective order from the Court. (0.2) Forward same to Mike Fitzgerald. (0.2)	1.1	550	\$605.00	Peter E Berlowe	1.1	0	0	0	0	0	0	0	0
12/1/2022	Legal research for new causes of action for amended complaint; (1.9) begin drafting amended complaint. (1.6)	3.5	500	\$1,750.00	Meredith J. Gussin	0	3.5	0	0	0	0	0	0	0
12/1/2022	Emails with Meredith Gussin regarding final version of protective order to send to Magistrate Becerra. (0.15)	0.15	550	\$82.50	Peter E Berlowe	0.15	0	0	0	0	0	0	0	0
11/30/2022	Strategy communications with Peter Berlowe and Meredith Gussin regarding good faith discussions with opposing counsel narrowing the scope of financial discovery. (0.3)	0.3	400	\$120.00	Francisco J. Barreto	0	0	0	0	0.3	0	0	0	0
11/30/2022	Legal research and analysis of additional causes of action to bring in amended complaint; (2.1) communication with client, PEB; (0.2) communication with opposing counsel re discovery deadlines. (0.2)	2.5	500	\$1,250.00	Meredith J. Gussin	0	2.5	0	0	0	0	0	0	0
11/29/2022	Communication with counsel for defendant regarding protective order; (0.3) edit and finalize same; (0.1) correspondence with client regarding discovery documents. (0.1)	0.5	500	\$250.00	Meredith J. Gussin	0	0.5	0	0	0	0	0	0	0
11/28/2022	Conduct strategy conference with Meredith Gussin to discuss issues presented on objection to tax returns in light of wage loss claim. (0.2)	0.2	400	\$80.00	Francisco J. Barreto	0	0	0	0	0.2	0	0	0	0
11/28/2022	Correspondence with Jenny Martinez at SoftwareONE; (0.5) Correspondence with Alaina FJ re outstanding issues re protective order, outstanding documents due in response to Defendant's Request for Production; (0.8) communicate re same with PEB. (1.9)	3.2	500	\$1,600.00	Meredith J. Gussin	0	3.2	0	0	0	0	0	0	0
11/23/2022	Correspondence with Alaina FJ regarding outstanding issues re protective order and outstanding discovery. (0.4)	0.4	500	\$200.00	Meredith J. Gussin	0	0.4	0	0	0	0	0	0	0
11/22/2022	Review subpoena to Yaleny De Varona; (0.1) correspondence with counsel for defendant regarding objections to request for production. (0.2)	0.3	500	\$150.00	Meredith J. Gussin	0	0.3	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
11/22/2022	Review subpoena to Yelany De Varona. (0.1) Emails with opposing counsel regarding same, and whether we would accept service of process. (0.2) Emails with opposing counsel regarding discovery dispute over our objections to certain document requests. (0.1) Email to Mike and Yelany regarding subpoena. (0.1) Call with them regarding same. (0.1)	0.6	550	\$330.00	Peter E Berlowe	0.6	0	0	0	0	0	0	0	0
11/21/2022	Emails with opposing counsel and Meredith Gussin regarding issues we have with protective order. (0.35)	0.35	550	\$192.50	Peter E Berlowe	0.35	0	0	0	0	0	0	0	0
11/18/2022	Correspondence with various counsel regarding language in protective order; (0.8) revise and edit same. (0.15)	0.8	500	\$400.00	Meredith J. Gussin	0	0.8	0	0	0	0	0	0	0
11/17/2022	Emails with opposing counsel and counsel for SoftwareOne and Microsoft regarding language of protective order. (0.15)	0.15	550	\$82.50	Peter E Berlowe	0.15	0	0	0	0	0	0	0	0
11/14/2022	Negotiate protective language with counsel for Defendant and SoftwareONE (1.1)	1.1	500	\$550.00	Meredith J. Gussin	0	1.1	0	0	0	0	0	0	0
11/14/2022	Review emails from Jenny Martinez and Counsel for McNae regarding protective order. (0.15) Emails with opposing counsel on other case issues. (0.1)	0.25	550	\$137.50	Peter E Berlowe	0.25	0	0	0	0	0	0	0	0
11/4/2022	Review discovery timeline in preparation of Request for Production; (0.25) review rules regarding privilege log, protective order. (1.55)	1.8	500	\$900.00	Meredith J. Gussin	0	1.8	0	0	0	0	0	0	0
11/4/2022	Review First RFP and make additions to the requests prepared by Meredith G. (0.2)	0.2	400	\$80.00	Francisco J. Barreto	0	0	0	0	0.2	0	0	0	0
11/4/2022	Draft, edit and finalize Plaintiff's First Request for Production of Documents to Defendant; (1.3) prepare same for service of process. (0.3)	1.6	500	\$800.00	Meredith J. Gussin	0	1.6	0	0	0	0	0	0	0
11/4/2022	Emails from Jenny Martinez and McNae's attorney regarding protective order. (0.1)	0.1	550	\$55.00	Peter E Berlowe	0.1	0	0	0	0	0	0	0	0
11/3/2022	Emails with opposing counsel regarding confidentiality agreement and comments from SoftwareOne and Microsoft. (0.15)	0.15	550	\$82.50	Peter E Berlowe	0.15	0	0	0	0	0	0	0	0
11/2/2022	Phone call with PEB to discuss strategy; (0.5) research local rules regarding protective order, notice of service, interrogatories, etc. (0.6)	1.1	500	\$550.00	Meredith J. Gussin	0	1.1	0	0	0	0	0	0	0
11/1/2022	Revise and finalize interrogatories to McNae; (0.4) prepare Request for Production. (0.9)	1.3	500	\$650.00	Meredith J. Gussin	0	1.3	0	0	0	0	0	0	0
10/31/2022	Conduct full review of interrogatories prepared by Partner for determining if any other questions should be asked to Defendants for issues raised in pleadings. (0.3)	0.3	400	\$120.00	Francisco J. Barreto	0	0	0	0	0.3	0	0	0	0
10/31/2022	Finalize production of documents in response to Defendant's Request for Production. (0.8)	0.8	500	\$400.00	Meredith J. Gussin	0	0.8	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
10/31/2022	Review email from Jenny Martinez regarding Mike Fitzgerald. (0.1) Forward to Mike Fitzgerald. Emails with Jenny Martinez. (0.1) Call with Mike Fitzgerald's lender. (1.5) Review proposed affidavit. (1.0) Emails with Mike's loan team. (0.2)	2.9	550	\$1,595.00	Peter E Berlowe	2.9	0	0	0	0	0	0	0	0
10/27/2022	Conduct strategy call with Peter Berlowe to discuss potential damages issues in which pain and suffering are subject. (1.2)	1.2	400	\$480.00	Francisco J. Barreto	0	0	0	0	1.2	0	0	0	0
10/27/2022	Draft Interrogatories to Defendant. (1.5)	1.5	500	\$750.00	Meredith J. Gussin	0	1.5	0	0	0	0	0	0	0
10/27/2022	Conference with Frank Barreto regarding mental injury type damages. (1.2) Emails with Jenny Martinez regarding my email on Mike. (0.3) Work with Meredith and Frank on discovery to McNae. (0.79)	2.29	550	\$1,259.50	Peter E Berlowe	2.29	0	0	0	0	0	0	0	0
10/26/2022	Telephone conference with counsel for McNae and PEB to discuss protective order; (0.8) review and assess objections to discovery and production re same. (1.8)	2.6	500	\$1,300.00	Meredith J. Gussin	0	2.6	0	0	0	0	0	0	0
10/26/2022	Prepare for and attend conference with opposing counsel on protective order and objections to discovery requests. (1.0) Review and revise protective order and send to opposing counsel. (1.1) Draft email to counsel for Software One for Mike Fitzgerald to review. (0.4) Finalize and send same. (0.1) Emails with counsel for David Carpenter. (0.8)	3.4	550	\$1,870.00	Peter E Berlowe	3.4	0	0	0	0	0	0	0	0
10/25/2022	Redact documents in advance of production; (1.0) review protective order draft. (0.4)	1.4	500	\$700.00	Meredith J. Gussin	0	1.4	0	0	0	0	0	0	0
10/25/2022	Emails with Jenny Martinez rescheduling the interview. (0.2) Emails with attorney for David Carpenter. (0.2) Call with Mike Fitzgerald regarding his call with Dieter Schlosser. (0.8) cursory review of McNae's counsel's revisions to the protective order. (1.2) Schedule conference to discuss protective order with opposing counsel tomorrow. (0.2)	2.6	550	\$1,430.00	Peter E Berlowe	2.6	0	0	0	0	0	0	0	0
10/24/2022	Review, redact, and prepare documents for production; (1.0) conference with client and PEB re interrogatory responses; (1.7) finalize protective order and send to opposing counsel. (0.6)	3.3	500	\$1,650.00	Meredith J. Gussin	0	3.3	0	0	0	0	0	0	0
10/24/2022	Prepare to finalize discovery documents with Mike Fitzgerald today. (0.8) Meet with Mike Fitzgerald and Yelany De Varona to notarize his interrogatories. (1.7) Legal research on scope of marital privilege for premarital communications. (1.4) Review and revise proposed protective order. (0.4)	4.3	550	\$2,365.00	Peter E Berlowe	4.3	0	0	0	0	0	0	0	0
10/21/2022	Revise protective order; (0.4) review and prepare all documents for production; (3.7) revise interrogatory answers. (0.4)	4.5	500	\$2,250.00	Meredith J. Gussin	0	4.5	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
10/21/2022	Emails with Mike Fitzgerald and Meredith Gussin regarding document production. (0.8) Conference with Meredith Gussin regarding proposed protective order. (0.4) Review and revise answers to interrogatories. (1.9)	3.1	550	\$1,705.00	Peter E Berlowe	3.1	0	0	0	0	0	0	0	0
10/20/2022	Meeting with Mike Fitzgerald, Yalena DeVerona, and Peter Berlowe; (2.2) review documents in preparation for document production and interrogatories. (0.8)	4	500	\$2,000.00	Meredith J. Gussin	0	4	0	0	0	0	0	0	0
10/20/2022	Review paperless order from yesterday's hearing. (0.1) In person meeting with Mike Fitzgerald, Yelany De Varona and Meredith Gussin to go over discovery responses. (3.2) Emails with opposing counsel regarding protective order. (0.2) Review SoftwareOne and Microsoft objections to their respective subpoenas. (0.3) Review documents forwarded by Mike Fitzgerald. (1.3)	5.1	550	\$2,805.00	Peter E Berlowe	5.1	0	0	0	0	0	0	0	0
10/19/2022	Prepare draft Protective Order in response to Court's ruling on discovery dispute in order to preserve right to keep disclosures from third parties protected; correspond/strategize with PEB re same (1.3)	1.3	500	\$650.00	Meredith J. Gussin	0	1.3	0	0	0	0	0	0	0
10/19/2022	Email exchange w/ M. Gussin regarding order for non-party production; (0.3) provide copy of stipulated protective order addressing some non-party production designation issues. (0.2)	0.5	550	\$275.00	Peter A. Koziol	0	0	0	0.5	0	0	0	0	0
10/19/2022	Prepare for and attend hearing with Magistrate Becerra on subpoenas to SoftwareOne and Microsoft. (2.6) Discuss hearing with Meredith Gussin. (0.3)	2.9	550	\$1,595.00	Peter E Berlowe	2.9	0	0	0	0	0	0	0	0
10/18/2022	Prepare Notice of Hearing and all Exhibits for Filing in advance of hearing on discovery dispute regarding subpoenas to Microsoft and Software One; (0.6) preparation of Instagram feed for production in response to Request for Production by McNae. (2.8)	3.4	500	\$1,700.00	Meredith J. Gussin	0	3.4	0	0	0	0	0	0	0
10/18/2022	Email exchange w/ M. Gussin and P. Berlowe regarding filing documents under seal; (0.2) telephonic conference regarding the same. (0.4)	0.6	550	\$330.00	Peter A. Koziol	0	0	0	0.6	0	0	0	0	0
10/18/2022	Prepare for tomorrow's hearing before Magistrate Becerra on Microsoft and SoftwareOne Subpoenas. (3.6) Work with Meredith Gussin on Filing for Magistrate Becerra. (0.6)	4.2	550	\$2,310.00	Peter E Berlowe	4.2	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
10/17/2022	Prepare Notice of Hearing and attendant exhibits to be filed with the Court in advance of hearing on discovery dispute regarding Microsoft and Software One subpoenas; (0.6) prepare documents responsive to Defendant's request for production; (1.4) revise and edit out interrogatories to Defendant. (0.8)	2.8	500	\$1,400.00	Meredith J. Gussin	0	2.8	0	0	0	0	0	0	0
10/17/2022	Working on discovery issues and case strategy with Meredith Gussin. (1.6) Reviewing and revising Meredith Gussin's submission to Magistrate Becerra and Exhibits thereto. (0.5)	2.1	550	\$1,155.00	Peter E Berlowe	2.1	0	0	0	0	0	0	0	0
10/14/2022	Review client's employment file, Software One code of conduct, correspond with opposing counsel to schedule hearing on discovery dispute regarding subpoenas. (1.11)	1.11	500	\$555.00	Meredith J. Gussin	0	1.11	0	0	0	0	0	0	0
10/14/2022	Conference call with Meredith Gussin on case issues. (0.3) Proposed scheduling for hearing dates. (0.3) Emails with Jenny Martinez regarding upcoming interview. (0.2)	0.8	550	\$440.00	Peter E Berlowe	0.8	0	0	0	0	0	0	0	0
10/13/2022	Review employment file provided by SoftwareOne to Mike Fitzgerald today. (0.8) Note important portions of employment contract. (0.4)	1.2	550	\$660.00	Peter E Berlowe	1.2	0	0	0	0	0	0	0	0
10/12/2022	Telephone conference with Mike Fitzgerald regarding his call with Dieter Schlosser. (1.2) Emails with Jenny Martinez and Mike Fitzgerald regarding upcoming additional interview. (0.3) Emails with Meredith Gussin on case strategy. (0.3)	1.8	550	\$990.00	Peter E Berlowe	1.8	0	0	0	0	0	0	0	0
10/11/2022	Working with Meredith Gussin on discovery responses and objection to Microsoft and SoftwareOne subpoenas. (1.9) Emails with Jenny Martinez regarding motion to strike subpoenas and discovery hearing with Magistrate regarding same. (0.4) Emails with client on discovery and upcoming hearing. (0.3)	2.6	550	\$1,430.00	Peter E Berlowe	2.6	0	0	0	0	0	0	0	0
10/10/2022	Telephone conference with client and PEB; (1.8) review discovery requests; (0.8) strategize regarding case. (0.4)	3	500	\$1,500.00	Meredith J. Gussin	0	3	0	0	0	0	0	0	0
10/10/2022	Zoom conference with Meredith Gussin and Mike Fitzgerald regarding interrogatory responses and documents to produce. (1.8) Emails with opposing counsel regarding submissions to the Court regarding objections to the Microsoft and SoftwareOne Subpoenas. (0.3) Work with Meredith Gussin on revised discovery responses. (2.1)	4.2	550	\$2,310.00	Peter E Berlowe	4.2	0	0	0	0	0	0	0	0
10/7/2022	Legal research regarding validity of various defenses to production sought by McNae. (1.4)	1.4	500	\$700.00	Meredith J. Gussin	0	1.4	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
10/7/2022	Emails with case team on scheduling of discovery meeting. (0.2) Emails with Meredith Gussin on Magistrate's rules for dealing with objections to subpoenas and case related strategy issues. (1.0)	1.2	550	\$660.00	Peter E Berlowe	1.2	0	0	0	0	0	0	0	0
10/6/2022	Review, edit and finalize Motion to Quash Supoenas of Microsoft and SoftwareONE; (1.4) prepare same for filing; (0.2) Correspondence with Client regarding upcoming responses due to McNae's discovery requests; (0.4) edit timeline to include notes on newly provided discovery from McNae from mental health counselor. (0.8)	2.8	500	\$1,400.00	Meredith J. Gussin	0	2.8	0	0	0	0	0	0	0
10/6/2022	Working with Meredith Gussin on draft objections and responses to interrogatories and document requests. (2.25) Filing motion to quash subpoenas with Meredith Gussin. (0.3)	3.55	550	\$1,952.50	Peter E Berlowe	3.55	0	0	0	0	0	0	0	0
10/5/2022	Legal research for and drafting of motion to quash subpoenas. (2.5) Emails with Meredith Gussin regarding same. (0.3)	2.8	550	\$1,540.00	Peter E Berlowe	2.8	0	0	0	0	0	0	0	0
10/4/2022	Prepare responses to McNae's interrogatories and request for production; (2.4) telephone conference with McNae's counsel; (0.3) review amended disclosures including psychotherapy notes from McNae's therapist. (0.7)	3.4	500	\$1,700.00	Meredith J. Gussin	0	3.4	0	0	0	0	0	0	0
10/4/2022	Attend discovery meet and confer over subpoenas via zoom conference with Meredith Gussin and opposing counsel. (1.1) Discuss same with Meredith Gussin after conference. (1.25) Cursory review of supplement disclosures made by McNae. (0.6) Forward same to Mike Fitzgerald. (0.1) Emails with Mike Fitzgerald and need to go over discovery requests with him. (0.2) Drafting motion to quash subpoenas. (0.5)	3.75	550	\$2,062.50	Peter E Berlowe	3.75	0	0	0	0	0	0	0	0
10/3/2022	Revise discovery requests, particularly interrogatories requesting specific instances of breach utilizing produced documents. (1.4)	1.4	500	\$700.00	Meredith J. Gussin	0	1.4	0	0	0	0	0	0	0
10/3/2022	Preparing for tomorrow's meet and confer. (0.5) Cursory review of Meredith Gussin's first draft of interrogatories. (0.2)	0.7	550	\$385.00	Peter E Berlowe	0.7	0	0	0	0	0	0	0	0
10/2/2022	Review documents in preparation of response to McNae's interrogatories. (1.6)	1.6	500	\$800.00	Meredith J. Gussin	0	1.6	0	0	0	0	0	0	0
10/2/2022	Legal research on case issues. (0.3) Emails with opposing counsel regarding setting a zoom conference on Tuesday. (0.1)	0.4	550	\$220.00	Peter E Berlowe	0.4	0	0	0	0	0	0	0	0
10/1/2022	Legal research on case issues. (0.6) Emails with opposing counsel on meet and confer on discovery issues. (0.1)	0.7	550	\$385.00	Peter E Berlowe	0.7	0	0	0	0	0	0	0	0
9/30/2022	Prepare responses to McNae's discovery requests. (3.4)	3.4	500	\$1,700.00	Meredith J. Gussin	0	3.4	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
9/30/2022	Continue drafting motion to quash subpoenas. (1.3) Reach out to Alaina Fotiu-Wojtowicz to confer on motion to quash. (0.2) Emails with Meredith Gussin regarding responding to McNae request for production. (0.4)	1.9	550	\$1,045.00	Peter E Berlowe	1.9	0	0	0	0	0	0	0	0
9/29/2022	Begin drafting motion to quash SoftwareONE and Microsoft Subpoenas. (1.9)	1.9	550	\$1,045.00	Peter E Berlowe	1.9	0	0	0	0	0	0	0	0
9/28/2022	Call with PEB re: strategy for challenging third party subpoenas served. (0.5)	0.5	550	\$275.00	Ellen M. Leibovitch	0	0	0	0	0	0	0	0.5	0
9/28/2022	Telephonic conference w/ P. Berlowe regarding subpoenas, protective order and discovery issues. (1.3)	1.3	550	\$715.00	Peter A. Koziol	0	0	0	1.3	0	0	0	0	0
9/28/2022	Emails and phone calls with Peter Koziol regarding Microsoft and SoftwareONE's subpoenas and moving for protective order in S.D. Fla. (1.3) Emails with Meredith Gussin regarding quashing subpoena. (0.2) Legal research on quashing subpoenas served in foreign jurisdictions. (0.3) Emails to Mike Fitzgerald regarding discussing subpoenas to Microsoft and Software One. (0.2) Telephone call with Mike Fitzgerald regarding SoftwareONE and Microsoft Subpoenas. (0.3)	2.4	550	\$1,320.00	Peter E Berlowe	2.4	0	0	0	0	0	0	0	0
9/27/2022	Prepare timeline; (1.8) analysis and summary of disclosures; (0.4) review subpoenas. (0.3)	2.5	500	\$1,250.00	Meredith J. Gussin	0	2.5	0	0	0	0	0	0	0
9/27/2022	Emails with Mike Fitzgerald and Jenny Martinez regarding continuing his interview. (0.3) Call with Mike Fitzgerald regarding same. (0.9) Call with Pat Dray regarding documents he needs for Criminal matter. (0.6) Answer his questions regarding status of the civil case. (0.3) Locate and send said documents to Pat Dray by dropbox. (0.4) Telephone conference with Jenny Martinez regarding subpoenas to software one and Microsoft. (2.1)	4.1	550	\$2,255.00	Peter E Berlowe	4.1	0	0	0	0	0	0	0	0
9/26/2022	Review email from Jenny Martinez regarding SoftwareONE wanting to continue interview of Mike Fitzgerald. (0.1)	0.1	550	\$55.00	Peter E Berlowe	0.1	0	0	0	0	0	0	0	0
9/21/2022	Review McNae's subpoena to Microsoft and Software One. (0.4)	0.4	500	\$200.00	Meredith J. Gussin	0	0.4	0	0	0	0	0	0	0
9/21/2022	Review subpoenas issued by McNae to Microsoft and SoftwareOne. (0.3) Forward same to Mike Fitzgerald. (0.1) Call with Mike Fitzgerald regarding same. (0.5)	0.9	550	\$495.00	Peter E Berlowe	0.9	0	0	0	0	0	0	0	0
9/20/2022	Review McNae's disclosures, police reports, Microsoft contracts, texts conversations; (2.7) Compile timeline, analysis of issues. (0.5)	3.2	500	\$1,600.00	Meredith J. Gussin	0	3.2	0	0	0	0	0	0	0
9/19/2022	Review McNae's discovery requests; (2.6) analysis of key issues in the case; (0.2) prepare timeline; (0.4) continue review of disclosures. (0.1)	3.3	500	\$1,650.00	Meredith J. Gussin	0	3.3	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
9/19/2022	Continue working of bates labeling of documents with case team. (0.4) Emails with opposing counsel regarding same. (0.2) Emails and phone conferences with Meredith Gussin regarding McNae's initial disclosures. (1.7) Provide bates labeled initial disclosure documents to opposing counsel. (0.3) Receive and review first set of interrogatories and document requests from opposing counsel. (0.7) Forward same to Mike Fitzgerald. (0.1)	3.4	550	\$1,870.00	Peter E Berlowe	3.4	0	0	0	0	0	0	0	0
9/16/2022	Continue review of McNae disclosures; create timeline. (2.6)	2.6	500	\$1,300.00	Meredith J. Gussin	0	2.6	0	0	0	0	0	0	0
9/15/2022	Construct timeline via text messages between McNae and various individuals to assess character issues; (0.6) continue review of discovery. (3.0)	3.6	500	\$1,800.00	Meredith J. Gussin	0	3.6	0	0	0	0	0	0	0
9/14/2022	Continue review of McNae's disclosures. (1.8)	1.8	500	\$900.00	Meredith J. Gussin	0	1.8	0	0	0	0	0	0	0
9/14/2022	Work with case team on bates labeling of documents. (0.15)	0.15	550	\$82.50	Peter E Berlowe	0.15	0	0	0	0	0	0	0	0
9/13/2022	Continue review/analysis of McNae's disclosures; (5.2) create timeline, notes regarding issues of consent. (0.4)	5.6	500	\$2,800.00	Meredith J. Gussin	0	5.6	0	0	0	0	0	0	0
9/13/2022	Emails with opposing counsel regarding bates labeling our production of documents. (0.1)	0.1	550	\$55.00	Peter E Berlowe	0.1	0	0	0	0	0	0	0	0
9/12/2022	Review McNae's initial disclosures to Fitzgerald. (3.0)	3	500	\$1,500.00	Meredith J. Gussin	0	3	0	0	0	0	0	0	0
9/11/2022	Continue initial review of initial disclosed documents from Ronda McNae and identifying hot documents. (2.8) Emails with Mike Fitzgerald regarding hot docs he should look at. (0.4)	3.2	550	\$1,760.00	Peter E Berlowe	3.2	0	0	0	0	0	0	0	0
9/10/2022	Initial review of initial disclosed documents from Ronda McNae and identifying hot documents. (6.9)	6.9	550	\$3,795.00	Peter E Berlowe	6.9	0	0	0	0	0	0	0	0
9/9/2022	Review Kings County Superior Court docket; (0.4) Review initial disclosures and production. (0.8)	1.2	500	\$600.00	Meredith J. Gussin	0	1.2	0	0	0	0	0	0	0
9/9/2022	Finalize and serve initial disclosures. (1.4) Begin reviewing initial disclosures from Ronda McNae. (3.2) Emails with opposing counsel regarding our initial disclosures. (0.3) Share those documents with Mike Fitzgerald. (2.5)	7.2	550	\$3,960.00	Peter E Berlowe	7.2	0	0	0	0	0	0	0	0
9/8/2022	Review Petition by Will McNae against David Carpenter regarding Mother Marjorie McNae; (0.4) analysis of possible character issues with respect to Ronda McNae and/or Will McNae. (0.8)	1.2	500	\$600.00	Meredith J. Gussin	0	1.2	0	0	0	0	0	0	0
9/8/2022	Telephonic conference with P. Berlowe regarding protective order and Defendant's malicious conduct. (0.4)	0.4	550	\$220.00	Peter A. Koziol	0	0	0	0.4	0	0	0	0	0
9/8/2022	Working on initial disclosures to opposing party. (6.0) Review files provided by Mike Fitzgerald by Dropbox. (0.3)	6.3	550	\$3,465.00	Peter E Berlowe	6.3	0	0	0	0	0	0	0	0
9/7/2022	Zoom Conference with Mike Fitzgerald regarding initial disclosures and other documents he may still have in his possession. (3.2) Working on initial disclosures to opposing party. (2.6)	5.8	550	\$3,190.00	Peter E Berlowe	5.8	0	0	0	0	0	0	0	0
9/6/2022	Working on initial disclosures to opposing party. Email to Mike Fitzgerald regarding same. (4.91)	4.91	550	\$2,700.50	Peter E Berlowe	4.91	0	0	0	0	0	0	0	0
9/1/2022	Review and discuss discovery requests with PEB; strategize issues re: (0.2) Defendant's character. (0.2)	0.4	500	\$200.00	Meredith J. Gussin	0	0.4	0	0	0	0	0	0	0
8/31/2022	Review, revise and finalize conferral report. (0.25) File same with Court. (0.1)	0.35	550	\$192.50	Peter E Berlowe	0.35	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
8/30/2022	Emails with opposing counsel regarding draft conferral report. (0.05)	0.05	550	\$27.50	Peter E Berlowe	0.05	0	0	0	0	0	0	0	0
8/29/2022	Draft Fitzgerald's First Set of Request for Admissions to Defendant McNae; (1.2) Draft, revise and edit Fitzgerald's First Set of Interrogatories to Defendant McNae. (2.4)	3.6	500	\$1,800.00	Meredith J. Gussin	0	3.6	0	0	0	0	0	0	0
8/29/2022	Review and revise opposing counsel's edits to the conferral report. (0.4) Forward revisions to opposing counsel. (0.4) Emails with Meredith Gussin regarding requests for production of documents. (0.3) Emails and phone calls with Meredith Gussin regarding discovery issues. (0.8)	1.7	550	\$935.00	Peter E Berlowe	1.7	0	0	0	0	0	0	0	0
8/26/2022	Draft conferral report for opposing counsel's review and comment. (1.4)	1.4	550	\$770.00	Peter E Berlowe	1.4	0	0	0	0	0	0	0	0
8/25/2022	Review and analysis of Instagram postings for relevance regarding breach of settlement agreement. (0.6)	0.6	500	\$300.00	Meredith J. Gussin	0	0.6	0	0	0	0	0	0	0
8/24/2022	Review Defendant's certificate of interested parties filed yesterday. (0.05) Email to Mike Fitzgerald regarding yesterday's meeting with Ronda McNae's attorney. Review reply brief and forward to Mike Fitzgerald. (0.05)	0.1	550	\$55.00	Peter E Berlowe	0.1	0	0	0	0	0	0	0	0
8/23/2022	Review settlement agreement pleadings, all correspondence between parties, etc. (1.5)	1.5	500	\$750.00	Meredith J. Gussin	0	1.5	0	0	0	0	0	0	0
8/23/2022	Draft outline of issues to address with opposing counsel for today's meet and confer. (0.8) Hold meet and confer with opposing counsel on Rule 16.1 and 26 issues. (1.5)	2.3	550	\$1,265.00	Peter E Berlowe	2.3	0	0	0	0	0	0	0	0
8/22/2022	Meet with PEB to discuss file; (1.5) review notes and internet articles by Defendant. (0.8)	2.3	500	\$1,150.00	Meredith J. Gussin	0	2.3	0	0	0	0	0	0	0
8/17/2022	Drafting and filing certificate of interested parties. (0.7) Drafting and filing memorandum in opposition to motion to dismiss. (5.0)	5.7	550	\$3,135.00	Peter E Berlowe	5.7	0	0	0	0	0	0	0	0
8/16/2022	Legal research for and drafting memorandum in opposition to motion to dismiss. (2.3)	2.3	550	\$1,265.00	Peter E Berlowe	2.3	0	0	0	0	0	0	0	0
8/11/2022	Emails with opposing counsel and her staff regarding holding zoom conference. (0.2) Drafting response to motion to dismiss. (0.6)	0.8	550	\$440.00	Peter E Berlowe	0.8	0	0	0	0	0	0	0	0
8/10/2022	Legal research in support of response to motion to dismiss. (0.8) Begin drafting memorandum in opposition to motion to dismiss. (1.2)	2	550	\$1,100.00	Peter E Berlowe	2	0	0	0	0	0	0	0	0
8/8/2022	Review scheduling order from the Court. (0.2) Forward same to Mike Fitzgerald. (0.1) Emails with Mike regarding same. (0.1)	0.4	550	\$220.00	Peter E Berlowe	0.4	0	0	0	0	0	0	0	0
8/5/2022	Emails with Mike Fitzgerald regarding evidence to share with SoftwareOne. (0.1) Emails with Mike regarding Ronda's response time. (0.1) Review motion to dismiss complaint. (0.4) Forward same to Mike. (0.1) Emails from and to Jenny Martinez. (0.1)	0.8	550	\$440.00	Peter E Berlowe	0.8	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MIG	ENA	PAK	FJB	DBM	VM	EML	AJC
8/1/2022	Prepare for today's SoftwareOne Interview of Mike Fitzgerald. (1.3) Attend SoftwareOne interview of Mike Fitzgerald. (1.8) Share certain emails and texts with SoftwareOne team that were raised in the interview. (0.3)	3.4	550	\$1,870.00	Peter E Berlowe	3.4	0	0	0	0	0	0	0	0
7/29/2022	Zoom conference with Mike Fitzgerald and Patrick Dray regarding criminal implications of upcoming SoftwareOne Interview. (1.4) Telephone conference with Pat Dray regarding same. (0.3) Put together collection of McNae emails and texts to share with SoftwareOne ahead of interview. (0.4) Email same to SoftwareOne team. (0.2)	2.3	550	\$1,265.00	Peter E Berlowe	2.3	0	0	0	0	0	0	0	0
7/28/2022	Emails with SoftwareOne folks regarding next week's interview of Mike Fitzgerald. (0.2) Dealing with case issues. (0.2)	0.4	550	\$220.00	Peter E Berlowe	0.4	0	0	0	0	0	0	0	0
7/22/2022	Telephone conference with David Carpenter's attorney. (0.4) Email to Mike Fitzgerald regarding same. (0.1)	0.5	550	\$275.00	Peter E Berlowe	0.5	0	0	0	0	0	0	0	0
7/21/2022	Coordinating Mike Fitzgerald's interview with SoftwareOne. (0.3) Call with Mike Fitzgerald regarding his having been suspended from SoftwareOne pending conclusion of their investigation. (2.3) Email to Pat Dray regarding same. (0.2) Working on motion for temporary restraining order and martialing evidence related thereto. (2.6)	5.4	550	\$2,970.00	Peter E Berlowe	5.4	0	0	0	0	0	0	0	0
7/20/2022	Working on motion for temporary restraining order and martialing evidence related thereto. (2.5) Zoom conference with Mike Fitzgerald. (2.6) Emails with Yelany DeVarona. (0.3) Emails with Jennifer Gaines regarding scheduling an interview with Mike Fitzgerald. (0.2)	5.6	550	\$3,080.00	Peter E Berlowe	5.6	0	0	0	0	0	0	0	0
7/19/2022	Working on motion for temporary restraining order and martialing evidence related thereto. (4.4) Email to Mike Fitzgerald regarding case issues. (0.4)	4.8	550	\$2,640.00	Peter E Berlowe	4.8	0	0	0	0	0	0	0	0
7/18/2022	Working on motion for temporary restraining order and martialing evidence related thereto. (5.4) Emails with Mike Fitzgerald on case issues. (0.4)	5.8	550	\$3,190.00	Peter E Berlowe	5.8	0	0	0	0	0	0	0	0
7/17/2022	Drafting motion for temporary restraining order. Marshalling exhibits. (5.3)	5.3	550	\$2,915.00	Peter E Berlowe	5.3	0	0	0	0	0	0	0	0
7/16/2022	Continue drafting motion for temporary restraining order. (2.1) Emails with Mike Fitzgerald regarding a David Carpenter reaching out to him on LinkedIn. (0.5) Send LinkedIn message to David Carpenter. (0.1) Telephone Conference with David Carpenter and his wife regarding all of his knowledge about Ronda McNae. (1.3) Email with Mike Carpenter regarding same. (0.2) Call with Mike Fitzgerald regarding call with David Carpenter. (0.4) Draft summary of conversation with David Carpenter and send out to case team. (0.7) Continue on motion for temporary injunction. (1.0)	6.3	550	\$3,465.00	Peter E Berlowe	6.3	0	0	0	0	0	0	0	0
7/15/2022	Reviewing finalized summons and getting to process server for rush delivery. (0.6) Begin drafting motion for temporary restraining order. (5.6)	6.2	550	\$3,410.00	Peter E Berlowe	6.2	0	0	0	0	0	0	0	0

Date	Description	hrs.	Rate	Total	Time Keeper	PEB	MJG	ENA	PAK	FJB	DBM	VM	EML	AJC	
7/14/2022	Forward Ronda McNae's response email to Pat Dray and Mike Fitzgerald. (0.2) Video conference with Jennifer Gaines, Michael McCabe and Jenny Martinez. (1.2) Draft simple breach of contract complaint and get it on file. (5.6) Draft summons and civil coversheet. (0.5) Emails with Jennifer Gaines. (0.2)	7.7	550	\$4,235.00	Peter E Berlowe	7.7	0	0	0	0	0	0	0	0	
7/14/2022	Telephonic call with P. Berlowe regarding defamation case. (0.7)	0.7	550	\$385.00	Peter A. Koziol	0	0	0	0.7	0	0	0	0	0	
7/13/2022	Collecting social media postings of Ronda McNae. (1.5) Emails with Mike Fitzgerald. (4.0) Zoom conference with Mike Fitzgerald and Yelany De Varona on case issues and strategy. Prepare draft email to Ronda McNae and send to Mike Fitzgerald for review. (0.6) Arrange for video conference with Jennifer Gaines and Jenny Martinez tomorrow. (0.3) Finalize and send response email to Ronda McNae. (0.6) Review response email from Ronda McNae. (0.2)	7.2	550	\$3,960.00	Peter E Berlowe	7.2	0	0	0	0	0	0	0	0	
7/12/2022	Forward Ronda's email and police reports to Mike Fitzgerald. (0.4) Zoom conference with Mike Fitzgerald and Yelany De Varona. (5.0) Emails with Pat Dray. Zoom conference with Jennifer Gaines, General Counsel of SoftwareOne NORAM, and outside counsel Jenny Martinez. (1.4)	6.8	550	\$3,740.00	Peter E Berlowe	6.8	0	0	0	0	0	0	0	0	
7/11/2022	Zoom conference with Mike Fitzgerald and Patrick Dray regarding Ronda McNae's recent breaches of the confidential settlement agreement. (2.0) Planning case strategy based upon email to employer and recent postings. (3.7) Review email and police reports from Ronda McNae and forward to case team and Pat Dray. (2.1) Arrange to speak with Jennifer Gaines in the morning. Emails and calls with Peter Koziol regarding case issues and status. (0.3)	7.1	550	\$3,905.00	Peter E Berlowe	7.1	0	0	0	0	0	0	0	0	
7/8/2022	Call with Pat Dray regarding new breaches of the settlement agreement being made by Ronda McNae. (0.15) Emails with Mike Fitzgerald regarding speaking next week on strategy. (0.1) Review recent McNae online postings. (0.1)	0.35	550	\$192.50	Peter E Berlowe	0.35	0	0	0	0	0	0	0	0	
		3,024.99		\$1,571,380.00		3,024.99	1,428.30	1,465.79	1.80	5.50	48.10	48.10	20.80	0.50	6.10
						\$550.00	\$500.00	\$550.00	\$550.00	\$400.00	\$400.00	\$400.00	\$550.00	\$300.00	
					\$1,571,380.00	\$785,565.00	\$732,895.00	\$990.00	\$3,025.00	\$19,240.00	\$19,240.00	\$8,320.00	\$275.00	\$1,830.00	

Exhibit K: Vendor Invoices By Vendor Name

Blacks Copy



BLACKSCOPY

27 S.E. 1 Avenue Miami, Florida 33131

Phone: 305 374 7826

WWW.BLACKSCOPY.COM

Tax id: 03-0380835 OFFICE STORE INC. dba BLACKS COPY

BILL TO

Ms Estefania Ochoa
Assouline & Berlowe
100 SE 2nd Street Suite 3105
Miami, FL 33131

SHIP TO

Ms Estefania Ochoa
Assouline & Berlowe
200 SE 2nd Street
Miami, FL 33131

INVOICE 23044**DATE** 04/21/2023**DUE DATE** 04/21/2023**BILLING REFERENCE**

FITZGERALT V MCHLAE

QUANTITY	DESCRIPTION	RATE	AMOUNT
1,720	Letter & Legal B/W Copies	0.12	206.40T
3,732	Color Copies Letter or Legal	0.59	2,201.88T
151	Manila Folders	1.00	151.00T

ATTN ESTEFANIA OCHOA

We appreciate the opportunity to serve you. We are the Litigation Support Specialists.

SUBTOTAL

2,559.28

TAX

179.15

TOTAL

2,738.43

PAYMENT

2,738.43

DUE UPON RECEIPT. PLEASE PAY FROM THIS INVOICE. NO OTHER INVOICE WILL BE SENT.

TOTAL DUE**\$0.00**

TERMS: Payment for this order is not assignable or transferable by the above-referenced client, in whole or in part , except by consent of Blacks Copy.

If this invoice is NOT paid by the due date, 5% late fee will be added, for each month after 1.5 % and cost of all collection fees will be added.



BLACKSCOPY

27 S.E. 1 Avenue Miami, Florida 33131
Phone: 305 374 7826
WWW.BLACKSCOPY.COM

Tax id: 03-0380835 OFFICE STORE INC. dba BLACKS COPY

BILL TO

Ms Estefania Ochoa
Assouline & Berlowe
100 SE 2nd Street Suite 3105
Miami, FL 33131

SHIP TO

Ms Estefania Ochoa
Assouline & Berlowe
Andrea Bos
200 SE 2nd Street
Miami, FL 33131

INVOICE 23109**DATE** 05/17/2023**DUE DATE** 06/01/2023**BILLING REFERENCE**

FITZGERALD V. MCNAE

QUANTITY	DESCRIPTION	RATE	AMOUNT
1,055	Process Files to Create Customized Output 6 exceptions	0.22	232.10T
ATTN ESTEFANIA OCHOA		SUBTOTAL	232.10
		TAX	16.25
We appreciate the opportunity to serve you. We are the Litigation Support Specialists.		TOTAL	248.35
DUE UPON RECEIPT. PLEASE PAY FROM THIS INVOICE. NO OTHER INVOICE WILL BE SENT.			
TOTAL DUE			\$248.35

TERMS: Payment for this order is not assignable or transferable by the above-referenced client, in whole or in part , except by consent of Blacks Copy.

If this invoice is NOT paid by the due date, 5% late fee will be added, for each month after 1.5 % and cost of all collection fees will be added.

Coastal Reporting, Inc.

Statement

COASTAL REPORTING INC

P.O BOX 812451

BOCA RATON, FL 33481

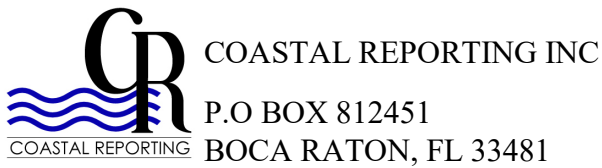
Date

6/18/2023

To:

PETER BERLOWE, ESQ.
 MIAMI TOWER
 100 SE 2ND STREET, SUITE 3105
 MIAMI, FLORIDA 33131

				Amount Due	Amount Enc.	
				\$3,005.10		
Date	Transaction			Amount	Balance	
12/31/2022	Balance forward				0.00	
03/22/2023	03.03.23 FITZGERALD V MCNAE- INV #12050. Due 03/22/2023. --- DEPOSITION OF --- COPY, 336 @ \$3.50 = 1,176.00 --- LITIGATION PACKAGE, 1 @ \$35.00 = 35.00 --- EMAILED 3/22/23			1,211.00	1,211.00	
03/30/2023	03.10.23 FITZGERALD V MCNAE- INV #12072. Due 03/30/2023. --- DEPOSITION OF --- COPY, 211 @ \$3.60 = 759.60 --- LITIGATION PACKAGE \$35.00 --- ETRAN SENT 3/30/23			794.60	2,005.60	
03/31/2023	03.10.23 FITZGERALD V MCNAE WIPER- INV #12077. Due 03/31/2023. --- DEPOSITION OF --- 10-14-DAY REGULAR O & 1, 114 @ \$4.50 = 513.00 --- LITIGATION PACKAGE \$35.00 --- PDF EMAILED 3/31/23			548.00	2,553.60	
06/14/2023	06.07.23 FITZGERALD V MCNAE- INV #12194. Due 06/14/2023. --- DEPOSITION OF \$ --- COPY, 119 @ \$3.50 = 416.50 --- LITIGATION PACKAGE, 1 @ \$35.00 = 35.00 --- PDF AND ELECTRONICALLY-MARKED EXHIBITS 161-166 EMAILED 6/14/23 --- ATTY: MEREDITH GUSSIN, ESQ.			451.50	3,005.10	
CURRENT		1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	Amount Due
0.00		451.50	0.00	2,553.60	0.00	\$3,005.10



Invoice

Date	Invoice #
3/22/2023	12050

Bill To

PETER BERLOWE, ESQ.
MIAMI TOWER
100 SE 2ND STREET, SUITE 3105
MIAMI, FLORIDA 33131

Job	Rep
03.03.23 FITZGERALD V MCNAE	TM

Description	Amount
VIDEO DEPOSITION OF:MICHAEL J. FITZGERALD TRANSCRIPT COPY; PAGES:336 LITIGATION PACKAGE (E-TRAN & MINI, EXHIBITS) EMAILED 3/22/23	1,176.00 35.00

All invoices are due upon receipt.
We accept Visa and MasterCard.
Unpaid invoices after 30 days of billing date will accrue interest
at the rate of 1.5% per month. Ordering party agrees to pay all
costs of collection, including attorney's fees.

Total	\$1,211.00
Payments/Credits	\$0.00
Balance Due	\$1,211.00

Phone #	Tax ID #	E-mail	Web Site
(561)843-5677		REPORTERTAMMY@AOL.COM	



COASTAL REPORTING INC

P.O BOX 812451

BOCA RATON, FL 33481

Invoice

Date	Invoice #
3/30/2023	12072

Bill To

PETER BERLOWE, ESQ.
MIAMI TOWER
100 SE 2ND STREET, SUITE 3105
MIAMI, FLORIDA 33131

Job	Rep
03.10.23 FITZGERALD V MCNAE	TM

Description	Amount
CONTINUED VIDEO DEPOSITION OF:MICHAEL FITZGERALD	
TRANSCRIPT COPY; PAGES:211 (VOL 2 - PAGES 333-542)	759.60
LITIGATION PACKAGE (E-TRAN & MINI, EXHIBITS)	35.00
ETTRAN SENT 3/30/23	

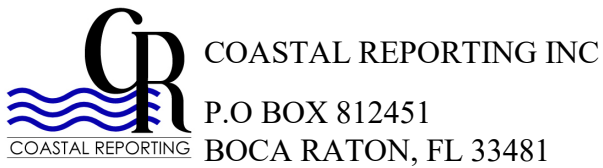
All invoices are due upon receipt.

We accept Visa and MasterCard.

Unpaid invoices after 30 days of billing date will accrue interest at the rate of 1.5% per month. Ordering party agrees to pay all costs of collection, including attorney's fees.

Total	\$794.60
Payments/Credits	\$0.00
Balance Due	\$794.60

Phone #	Tax ID #	E-mail	Web Site
(561)843-5677		REPORTERTAMMY@AOL.COM	



Invoice

Date	Invoice #
3/31/2023	12077

Bill To

PETER BERLOWE, ESQ.
MIAMI TOWER
100 SE 2ND STREET, SUITE 3105
MIAMI, FLORIDA 33131

Job	Rep
03.10.23 FITZGERALD V MCNAE WIPER	TM

Description	Amount
VIDEO DEPOSITION OF:TOM WIPER	
TRANSCRIPT O & 1; PAGES:114	513.00
LITIGATION PACKAGE (E-TRAN & MINI, EXHIBITS)	35.00
PDF EMAILED 3/31/23	

All invoices are due upon receipt.
We accept Visa and MasterCard.
Unpaid invoices after 30 days of billing date will accrue interest
at the rate of 1.5% per month. Ordering party agrees to pay all
costs of collection, including attorney's fees.

Total	\$548.00
Payments/Credits	\$0.00
Balance Due	\$548.00

Phone #	Tax ID #	E-mail	Web Site
(561)843-5677		REPORTERTAMMY@AOL.COM	



COASTAL REPORTING INC

P.O BOX 812451

BOCA RATON, FL 33481

Invoice

Date	Invoice #
7/23/2023	12258

Bill To

PETER BERLOWE, ESQ.
 MIAMI TOWER
 100 SE 2ND STREET, SUITE 3105
 MIAMI, FLORIDA 33131

Job	Rep
07.14.23 MCNAE V FITZGERALD	TM

Description	Amount
DEPOSITION OF:KIM FROMME, PH.D.	409.50
TRANSCRIPT COPY; PAGES:117	
LITIGATION PACKAGE (E-TRAN & MINI, EXHIBITS)	35.00
ETTRAN SENT 7/23/23	

All invoices are due upon receipt.
 We accept Visa and MasterCard.
 Unpaid invoices after 30 days of billing date will accrue interest
 at the rate of 1.5% per month. Ordering party agrees to pay all
 costs of collection, including attorney's fees.

Total	\$444.50
Payments/Credits	\$0.00
Balance Due	\$444.50

Phone #	Tax ID #	E-mail	Web Site
(561)843-5677		REPORTERTAMMY@AOL.COM	

Esquire Depositions

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 2/9/2023
Terms Net 30
Due Date 3/11/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case			
1/26/2023	J9121779	Seattle, WASHINGTON	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA M			
Description	Deponent	Qty	Unit Rate	Tax	Amount	
REMOTE VIDEO FIRST 2 HOURS	David Carpenter	1	250.00	No	\$250.00	
DIGITAL MEDIA REMOTE VIDEO	David Carpenter	2	35.00	No	\$70.00	
HANDLING FEE	David Carpenter	1	25.00	No	\$25.00	

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 345.00
Shipping Cost (n/a) 0.00
Total \$345.00
Amount Due 345.00

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Remit to:

Esquire Deposition Solutions, LLC
P. O. Box 846099
Dallas, TX 75284-6099

Federal Express, UPS or Overnight USPS:

Esquire Deposition Solutions, LLC
Lockbox 846099
1950 N. Stemmons Freeway
Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami

Client # C368108

Invoice # INV2402585

Invoice Date 2/9/2023

Due Date 3/11/2023

Amount Due \$345.00

ESQUIRE
DEPOSITION SOLUTIONS
1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 2/8/2023
Terms Net 30
Due Date 3/10/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case			
1/26/2023	J9121779	Seattle, WASHINGTON	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA M			
Description	Deponent	Qty	Unit Rate	Tax	Amount	
APP FEE: FIRST HOUR	David Carpenter	1	80.00	No	\$80.00	
APP FEE: ADDITIONAL HOURS	David Carpenter	1	80.00	No	\$80.00	
TRANSCRIPT - O&1-VID-VC-WI	David Carpenter	111	5.75	No	\$638.25	
E-EXHIBITS B&W ORIG	David Carpenter	45	0.65	No	\$29.25	
CONDENSED TRANSCRIPT	David Carpenter	1	25.00	No	\$25.00	
PROCESSING & COMPLIANCE	David Carpenter	1	50.00	No	\$50.00	

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 902.50
Shipping Cost (n/a) 0.00
Total \$902.50
Amount Due 902.50

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Dallas, TX 75284-6099

Federal Express, UPS or Overnight USPS:

Esquire Deposition Solutions, LLC
Lockbox 846099
1950 N. Stemmons Freeway
Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami

Client # C368108

Invoice # INV2401925

Invoice Date 2/8/2023

Due Date 3/10/2023

Amount Due \$902.50

Invoice Number	Invoice Creation Date	Status	Invoice Due Date	Invoice Amount Due	Case name
INV2549145	Aug 07, 2023	Current	Sep 06, 2023	\$ 190.00	MICHAEL J. FITZGERALD V. RONDA MCNAE
INV2543591	Jul 31, 2023	Current	Aug 30, 2023	\$ 370.00	MICHAEL J. FITZGERALD V. RONDA MCNAE
INV2541724	Jul 27, 2023	Current	Aug 26, 2023	\$ 1,323.25	MICHAEL J. FITZGERALD V. RONDA MCNAE
INV2538283	Jul 24, 2023	Current	Aug 23, 2023	\$ 625.00	MICHAEL J. FITZGERALD V. RONDA MCNAE
INV2535078	Jul 19, 2023	Current	Aug 18, 2023	\$ 250.00	MICHAEL J. FITZGERALD V. RONDA MCNAE
INV2535083	Jul 19, 2023	Current	Aug 18, 2023	\$ 175.00	MICHAEL J. FITZGERALD V. RONDA MCNAE
				\$ 2,933.25	

**Invoice INV2549145**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 8/7/2023
Terms Net 30
Due Date 9/6/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Berlowe, Peter E
100 S.E. 2nd, Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
7/27/2023	J9805985	Miami, FLORIDA	MICHAEL J. FITZGERALD V. RONDA MCNAE

Description	Deponent	Qty	Unit Rate	Tax	Amount
APP FEE: FIRST HOUR TKDWN	James Warren Hopper	1	130.00	No	\$130.00
APP FEE: ADDITIONAL HOURS TKDWN	James Warren Hopper	1	60.00	No	\$60.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 190.00
Shipping Cost (n/a) 0.00
Total \$190.00
Amount Due 190.00

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Lockbox 846099
1950 N. Stemmons Freeway
Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2549145**Invoice Date** 8/7/2023**Due Date** 9/6/2023**Amount Due** \$190.00

**Invoice INV2543591**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 7/31/2023
Terms Net 30
Due Date 8/30/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
7/28/2023	J10037718	Miami, FLORIDA	MICHAEL J. FITZGERALD V. RONDA MCNAE

Description	Deponent	Qty	Unit Rate	Tax	Amount
APP FEE: FIRST HOUR TKDWN	Dr. Ho	1	130.00	No	\$130.00
APP FEE: FIRST HOUR OVERTIME	Dr. Ho	1	140.00	No	\$140.00
APP FEE: ADDITIONAL HOURS OVERTIME	Dr. Ho	1	100.00	No	\$100.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 370.00
Shipping Cost (n/a) 0.00
Total \$370.00
Amount Due 370.00

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Dallas, TX 75208

Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2543591**Invoice Date** 7/31/2023**Due Date** 8/30/2023**Amount Due** \$370.00

**Invoice INV2541724**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 07/27/2023
Terms Net 30
Due Date 08/26/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
07/13/2023	J9839013	, FLORIDA	MICHAEL J. FITZGERALD V. RONDA MCNAE

Description	Deponent	Qty	Unit Rate	Tax	Amount
APP FEE: FIRST HOUR	Patrice Sanchez	1	95.00	No	\$95.00
APP FEE: ADDITIONAL HOURS	Patrice Sanchez	4	50.00	No	\$200.00
TRANSCRIPT - O&1-VC-VID-WI	Patrice Sanchez	179	5.20	No	\$930.80
CONDENSED TRANSCRIPT	Patrice Sanchez	1	20.00	No	\$20.00
E-EXHIBITS B&W ORIG	Patrice Sanchez	66	0.65	No	\$42.90
E- EXHIBITS COLOR ORIG	Patrice Sanchez	7	0.65	No	\$4.55
PROCESSING & COMPLIANCE	Patrice Sanchez	1	30.00	No	\$30.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 1,323.25
Shipping Cost (n/a) 0.00
Total \$1,323.25
Amount Due 1,323.25

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1950 N. Stemmons Freeway
Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2541724**Invoice Date** 07/27/2023**Due Date** 08/26/2023**Amount Due** \$1,323.25



1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 7/24/2023
Terms Net 30
Due Date 8/23/2023

Invoice INV2538283

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
7/13/2023	J9839013	, FLORIDA	MICHAEL J. FITZGERALD V. RONDA MCNAE

Description	Deponent	Qty	Unit Rate	Tax	Amount
REMOTE VIDEO FIRST 2 HOURS	Patrice Sanchez	1	250.00	No	\$250.00
REMOTE VIDEO HOURLY	Patrice Sanchez	3	125.00	No	\$375.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 625.00
Shipping Cost (n/a) 0.00
Total \$625.00
Amount Due 625.00

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Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami

Client # C368108

Invoice # INV2538283

Invoice Date 7/24/2023

Due Date 8/23/2023

Amount Due \$625.00

**Invoice INV2535078**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 7/19/2023
Terms Net 30
Due Date 8/18/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
7/14/2023	J9802776	Miami, FLORIDA	MICHAEL J. FITZGERALD V. RONDA MCNAE

Description	Deponent	Qty	Unit Rate	Tax	Amount
REMOTE VIDEO CANCEL	ABIGAIL LEONARD	1	250.00	No	\$250.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 250.00
Shipping Cost (n/a) 0.00
Total \$250.00
Amount Due 250.00

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Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2535078**Invoice Date** 7/19/2023**Due Date** 8/18/2023**Amount Due** \$250.00

**Invoice INV2535083**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 7/19/2023
Terms Net 30
Due Date 8/18/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
7/14/2023	J9802776	Miami, FLORIDA	MICHAEL J. FITZGERALD V. RONDA MCNAE

Description	Deponent	Qty	Unit Rate	Tax	Amount
CANCELLATION	ABIGAIL LEONARD	1	175.00	No	\$175.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 175.00
Shipping Cost (n/a) 0.00
Total \$175.00
Amount Due 175.00

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Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2535083**Invoice Date** 7/19/2023**Due Date** 8/18/2023**Amount Due** \$175.00



Invoice INV2549145

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 8/7/2023
Terms Net 30
Due Date 9/6/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Berlowe, Peter E
100 S.E. 2nd, Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
7/27/2023	J9805985	Miami, FLORIDA	MICHAEL J. FITZGERALD V. RONDA MCNAE

Description	Deponent	Qty	Unit Rate	Tax	Amount
APP FEE: FIRST HOUR TKDWN	James Warren Hopper	1	130.00	No	\$130.00
APP FEE: ADDITIONAL HOURS TKDWN	James Warren Hopper	1	60.00	No	\$60.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 190.00
Shipping Cost (n/a) 0.00
Total \$190.00
Amount Due 190.00

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Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami

Client # C368108

Invoice # INV2549145

Invoice Date 8/7/2023

Due Date 9/6/2023

Amount Due \$190.00



ESQUIRE

DEPOSITION SOLUTIONS

1500 Centre Parkway Suite 100
Atlanta, GA GA 30344, United States

Assouline & Berlowe - Miami

Statement Date: 07/07/2023

Eric Assouline
100 Southeast 2nd Street
Suite 3105

Miami, FL 33131, United States

Phone: 305-567-5576

E-mail: EO@AssoulineBerlowe.com

<u>Transaction Date</u>	<u>Document</u>	<u>Case name</u>	<u>Attorney</u>	<u>Due date</u>	<u>Days Past Due</u>	<u>Total amount</u>	<u>Payments/Credits</u>	<u>Balance due</u>	<u>Firm File Number</u>
05/02/2023	INV2471971	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MCNAE AND WILLIAM MCNAE	Gussin, Meredith J	06/01/2023	36	\$718.30	-	718.30	
05/09/2023	INV2477296	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MCNAE AND WILLIAM MCNAE	Gussin, Meredith J	06/08/2023	29	\$1,930.00	-	1,930.00	
05/10/2023	INV2478933	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MCNAE AND WILLIAM MCNAE	Gussin, Meredith J	06/09/2023	28	\$4,616.65	-	4,616.65	
05/15/2023	INV2482060	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MCNAE AND WILLIAM MCNAE	Gussin, Meredith J	06/14/2023	23	\$1,765.00	-	1,765.00	
05/19/2023	INV2486889	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MCNAE AND WILLIAM MCNAE	Gussin, Meredith J	06/18/2023	19	\$3,824.05	-	3,824.05	
05/31/2023	INV2496981	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MCNAE AND WILLIAM MCNAE	Gussin, Meredith J	06/30/2023	7	\$1,089.75	-	1,089.75	
06/13/2023	INV2506926	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MCNAE AND WILLIAM MCNAE	Meredith Gussin	07/13/2023	0	\$175.00	-	175.00	

<u>Transaction Date</u>	<u>Document</u>	<u>Case name</u>	<u>Attorney</u>	<u>Due date</u>	<u>Days Past Due</u>	<u>Total amount</u>	<u>Payments/Credits</u>	<u>Balance due</u>	<u>Firm File Number</u>
06/13/2023	INV2506925	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MCNAE AND WILLIAM MCNAE	Meredith Gussin	07/13/2023	0	\$250.00	-	250.00	
06/30/2023	INV2521281	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MCNAE AND WILLIAM MCNAE	Gussin, Meredith J	07/30/2023	0	\$1,051.00	-	1,051.00	
07/05/2023	INV2523658	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MCNAE AND WILLIAM MCNAE	Gussin, Meredith J	08/04/2023	0	\$612.50	-	612.50	
Total due:								USD	16,032.25

Aging - USD

Current	1-30 days	31-60 days	61-90 days	> 90 days
2,088.50	13,225.45	718.30	-	-

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**Invoice INV2523658**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 7/5/2023
Terms Net 30
Due Date 8/4/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case			
6/12/2023	J9705468	Miami, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MO			
Description		Deponent	Qty	Unit Rate	Tax	Amount
REMOTE VIDEO FIRST 2 HOURS		Matthew Mead	1	250.00	No	\$250.00
REMOTE VIDEO HOURLY		Matthew Mead	1	125.00	No	\$125.00
DIGITAL MEDIA MPEG1		Matthew Mead	2.5	85.00	No	\$212.50
HANDLING FEE		Matthew Mead	1	25.00	No	\$25.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 612.50
Shipping Cost (n/a) 0.00
Total \$612.50
Amount Due 612.50

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P. O. Box 846099
Dallas, TX 75284-6099

Federal Express, UPS or Overnight USPS:

Esquire Deposition Solutions, LLC
Lockbox 846099
1950 N. Stemmons Freeway
Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami

Client # C368108

Invoice # INV2523658

Invoice Date 7/5/2023

Due Date 8/4/2023

Amount Due \$612.50

**Invoice INV2521281**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 6/30/2023
Terms Net 30
Due Date 7/30/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case			
6/12/2023	J9705468	Miami, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MC			
Description		Deponent	Qty	Unit Rate	Tax	Amount
APP FEE: FIRST HOUR		Matthew Mead	1	95.00	No	\$95.00
APP FEE: ADDITIONAL HOURS		Matthew Mead	2	50.00	No	\$100.00
TRANSCRIPT - O&1-VID-VC-WI		Matthew Mead	155	5.20	No	\$806.00
CONDENSED TRANSCRIPT		Matthew Mead	1	20.00	No	\$20.00
PROCESSING & COMPLIANCE		Matthew Mead	1	30.00	No	\$30.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 1,051.00
Shipping Cost (n/a) 0.00
Total \$1,051.00
Amount Due 1,051.00

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Lockbox 846099
1950 N. Stemmons Freeway
Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2521281**Invoice Date** 6/30/2023**Due Date** 7/30/2023**Amount Due** \$1,051.00

**Invoice INV2506926**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 6/13/2023
Terms Net 30
Due Date 7/13/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
6/9/2023	J9784809	Miami, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MC

Description	Deponent	Qty	Unit Rate	Tax	Amount
CNCL ON SITE/NO SHOW/BUST	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MCNAE AND WILLIAM MCNAE	1	175.00	No	\$175.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 175.00
Shipping Cost (n/a) 0.00
Total \$175.00
Amount Due 175.00

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Dallas, TX 75208

Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2506926**Invoice Date** 6/13/2023**Due Date** 7/13/2023**Amount Due** \$175.00

**Invoice INV2506925**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 6/13/2023
Terms Net 30
Due Date 7/13/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
6/9/2023	J9784809	Miami, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA M

Description	Deponent	Qty	Unit Rate	Tax	Amount
REMOTE VIDEO CANCEL	ABIGAIL LEONARD	1	250.00	No	\$250.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 250.00
Shipping Cost (n/a) 0.00
Total \$250.00
Amount Due 250.00

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Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2506925**Invoice Date** 6/13/2023**Due Date** 7/13/2023**Amount Due** \$250.00

**Invoice INV2496981**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 5/31/2023
Terms Net 30
Due Date 6/30/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
5/17/2023	J9670439	Miami, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA M

Description	Deponent	Qty	Unit Rate	Tax	Amount
APP FEE: FIRST HOUR	Sirena Herd	1	95.00	No	\$95.00
APP FEE: ADDITIONAL HOURS	Sirena Herd	2	50.00	No	\$100.00
TRANSCRIPT - O&1-VC-WI	Sirena Herd	129	4.80	No	\$619.20
E- EXHIBITS COLOR ORIG	Sirena Herd	347	0.65	No	\$225.55
CONDENSED TRANSCRIPT	Sirena Herd	1	20.00	No	\$20.00
PROCESSING & COMPLIANCE	Sirena Herd	1	30.00	No	\$30.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 1,089.75
Shipping Cost (n/a) 0.00
Total \$1,089.75
Amount Due 1,089.75

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1950 N. Stemmons Freeway
Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2496981**Invoice Date** 5/31/2023**Due Date** 6/30/2023**Amount Due** \$1,089.75

**Invoice INV2486889**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 5/19/2023
Terms Net 30
Due Date 6/18/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
4/28/2023	J9498184	miami, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MC

Description	Deponent	Qty	Unit Rate	Tax	Amount
APP FEE: FIRST HOUR		1	95.00	No	\$95.00
APP FEE: ADDITIONAL HOURS		6.5	50.00	No	\$325.00
APP FEE: ADDITIONAL HOURS OVERTIME		3.5	100.00	No	\$350.00
ON-SITE RESOURCE FEE		1	125.00	No	\$125.00
TRANSCRIPT - O&1-VID-WI	Ronda McNae REDACTED	490	4.80	No	\$2,352.00
EXHIBITS W/TABS	Ronda McNae REDACTED	299	0.65	No	\$194.35
DIGITAL TRANSCRIPT-PDF-PTX	Ronda McNae REDACTED	1	35.00	No	\$35.00
CONDENSED TRANSCRIPT	Ronda McNae REDACTED	1	20.00	No	\$20.00
PROCESSING & COMPLIANCE	Ronda McNae REDACTED	1	30.00	No	\$30.00
TRANSCRIPT - O&1-VID-WI	Ronda McNae CONFIDENTIAL	34	4.80	No	\$163.20
DIGITAL TRANSCRIPT-PDF-PTX	Ronda McNae CONFIDENTIAL	1	35.00	No	\$35.00
CONDENSED TRANSCRIPT	Ronda McNae CONFIDENTIAL	1	20.00	No	\$20.00
PROCESSING & COMPLIANCE	Ronda McNae CONFIDENTIAL	1	30.00	No	\$30.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 3,774.55
Shipping Cost (FedEx) 49.50
Total \$3,824.05
Amount Due 3,824.05

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Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2486889**Invoice Date** 5/19/2023**Due Date** 6/18/2023**Amount Due** \$3,824.05

**Invoice INV2482060**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 5/15/2023
Terms Net 30
Due Date 6/14/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case			
4/28/2023	J9498184	miami, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MC			
Description		Deponent	Qty	Unit Rate	Tax	Amount
VIDEOGRAPHER MINIMUM		Ronda McNae	1	325.00	No	\$325.00
VIDEOGRAPHER ADDITIONAL HOURS		Ronda McNae	6	130.00	No	\$780.00
VIDEOGRAPHER ADDITIONAL HOURS OVERTIME		Ronda McNae	4	165.00	No	\$660.00
</						

Subtotal 1,765.00
Shipping Cost (n/a) 0.00
Total \$1,765.00
Amount Due 1,765.00

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Esquire Deposition Solutions, LLC
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1950 N. Stemmons Freeway
Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2482060**Invoice Date** 5/15/2023**Due Date** 6/14/2023**Amount Due** \$1,765.00

**Invoice INV2478933**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 5/10/2023
Terms Net 30
Due Date 6/9/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
4/26/2023	J9498182	miami, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA M

Description	Deponent	Qty	Unit Rate	Tax	Amount
APP FEE: FIRST HOUR	William McNae	1	95.00	No	\$95.00
APP FEE: ADDITIONAL HOURS	William McNae	7	50.00	No	\$350.00
APP FEE: ADDITIONAL HOURS OVERTIME	William McNae	5	100.00	No	\$500.00
TRANSCRIPT - O&1-VID-WI	William McNae	558	4.80	No	\$2,678.40
EXHIBITS W/TABS	William McNae	69	0.65	No	\$44.85
EXHIBITS COLOR	William McNae	73	1.50	No	\$109.50
CONDENSED TRANSCRIPT	William McNae	1	20.00	No	\$20.00
DIGITAL TRANSCRIPT-PDF-PTX	William McNae	1	35.00	No	\$35.00
PROCESSING & COMPLIANCE	William McNae	1	30.00	No	\$30.00
TRANSCRIPT - O&1-VID-WI	William McNae	103	4.80	No	\$494.40
CONDENSED TRANSCRIPT	William McNae	1	20.00	No	\$20.00
DIGITAL TRANSCRIPT-PDF-PTX	William McNae	1	35.00	No	\$35.00
PROCESSING & COMPLIANCE	William McNae	1	30.00	No	\$30.00
ON-SITE RESOURCE FEE		1	125.00	No	\$125.00
		1	0.00	No	\$0.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 4,567.15
Shipping Cost (FedEx) 49.50
Total \$4,616.65
Amount Due 4,616.65

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P. O. Box 846099
Dallas, TX 75284-6099

Federal Express, UPS or Overnight USPS:

Esquire Deposition Solutions, LLC
Lockbox 846099
1950 N. Stemmons Freeway
Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2478933**Invoice Date** 5/10/2023**Due Date** 6/9/2023**Amount Due** \$4,616.65

**Invoice INV2477296**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 5/9/2023
Terms Net 30
Due Date 6/8/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case				
4/26/2023	J9498182	miami, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MC				
Description		Deponent	Qty	Unit Rate	Tax	Amount	
VIDEOGRAPHER MINIMUM		William McNae	1	325.00	No	\$325.00	
VIDEOGRAPHER ADDITIONAL HOURS		William McNae	6	130.00	No	\$780.00	
VIDEOGRAPHER ADDITIONAL HOURS OVERTIME		William McNae	5	165.00	No	\$825.00	

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 1,930.00
Shipping Cost (n/a) 0.00
Total \$1,930.00
Amount Due 1,930.00

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1950 N. Stemmons Freeway
Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2477296**Invoice Date** 5/9/2023**Due Date** 6/8/2023**Amount Due** \$1,930.00

**Invoice INV2471971**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 5/2/2023
Terms Net 30
Due Date 6/1/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case			
4/14/2023	J9510961	, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MO			
Description		Deponent	Qty	Unit Rate	Tax	Amount
APP FEE: FIRST HOUR		Lily Vasquez	1	95.00	No	\$95.00
APP FEE: ADDITIONAL HOURS		Lily Vasquez	1	50.00	No	\$50.00
TRANSCRIPT - O&1-VC-WI		Lily Vasquez	96	4.80	No	\$460.80
DIGITAL TRANSCRIPT-PDF-PTX		Lily Vasquez	1	35.00	No	\$35.00
CONDENSED TRANSCRIPT		Lily Vasquez	1	20.00	No	\$20.00
PROCESSING & COMPLIANCE		Lily Vasquez	1	30.00	No	\$30.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 690.80
Shipping Cost (FedEx) 27.50
Total \$718.30
Amount Due 718.30

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Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2471971**Invoice Date** 5/2/2023**Due Date** 6/1/2023**Amount Due** \$718.30

**Invoice INV2471971**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 5/2/2023
Terms Net 30
Due Date 6/1/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case			
4/14/2023	J9510961	, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MO			
Description		Deponent	Qty	Unit Rate	Tax	Amount
APP FEE: FIRST HOUR		Lily Vasquez	1	95.00	No	\$95.00
APP FEE: ADDITIONAL HOURS		Lily Vasquez	1	50.00	No	\$50.00
TRANSCRIPT - O&1-VC-WI		Lily Vasquez	96	4.80	No	\$460.80
DIGITAL TRANSCRIPT-PDF-PTX		Lily Vasquez	1	35.00	No	\$35.00
CONDENSED TRANSCRIPT		Lily Vasquez	1	20.00	No	\$20.00
PROCESSING & COMPLIANCE		Lily Vasquez	1	30.00	No	\$30.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 690.80
Shipping Cost (FedEx) 27.50
Total \$718.30
Amount Due 718.30

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Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2471971**Invoice Date** 5/2/2023**Due Date** 6/1/2023**Amount Due** \$718.30

**Invoice INV2471971**

1500 Centre Pkwy
Suite 100
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888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 5/2/2023
Terms Net 30
Due Date 6/1/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
4/14/2023	J9510961	, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA M

Description	Deponent	Qty	Unit Rate	Tax	Amount
APP FEE: FIRST HOUR	Lily Vasquez	1	95.00	No	\$95.00
APP FEE: ADDITIONAL HOURS	Lily Vasquez	1	50.00	No	\$50.00
TRANSCRIPT - O&1-VC-WI	Lily Vasquez	96	4.80	No	\$460.80
DIGITAL TRANSCRIPT-PDF-PTX	Lily Vasquez	1	35.00	No	\$35.00
CONDENSED TRANSCRIPT	Lily Vasquez	1	20.00	No	\$20.00
PROCESSING & COMPLIANCE	Lily Vasquez	1	30.00	No	\$30.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 690.80
Shipping Cost (FedEx) 27.50
Total \$718.30
Amount Due 718.30

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Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2471971**Invoice Date** 5/2/2023**Due Date** 6/1/2023**Amount Due** \$718.30

**Invoice INV2477296**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 5/9/2023
Terms Net 30
Due Date 6/8/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case				
4/26/2023	J9498182	miami, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MC				
Description		Deponent	Qty	Unit Rate	Tax	Amount	
VIDEOGRAPHER MINIMUM		William McNae	1	325.00	No	\$325.00	
VIDEOGRAPHER ADDITIONAL HOURS		William McNae	6	130.00	No	\$780.00	
VIDEOGRAPHER ADDITIONAL HOURS OVERTIME		William McNae	5	165.00	No	\$825.00	

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 1,930.00
Shipping Cost (n/a) 0.00
Total \$1,930.00
Amount Due 1,930.00

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1950 N. Stemmons Freeway
Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami

Client # C368108

Invoice # INV2477296

Invoice Date 5/9/2023

Due Date 6/8/2023

Amount Due \$1,930.00

**Invoice INV2478933**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 5/10/2023
Terms Net 30
Due Date 6/9/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
4/26/2023	J9498182	miami, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA M

Description	Deponent	Qty	Unit Rate	Tax	Amount
APP FEE: FIRST HOUR	William McNae	1	95.00	No	\$95.00
APP FEE: ADDITIONAL HOURS	William McNae	7	50.00	No	\$350.00
APP FEE: ADDITIONAL HOURS OVERTIME	William McNae	5	100.00	No	\$500.00
TRANSCRIPT - O&1-VID-WI	William McNae	558	4.80	No	\$2,678.40
EXHIBITS W/TABS	William McNae	69	0.65	No	\$44.85
EXHIBITS COLOR	William McNae	73	1.50	No	\$109.50
CONDENSED TRANSCRIPT	William McNae	1	20.00	No	\$20.00
DIGITAL TRANSCRIPT-PDF-PTX	William McNae	1	35.00	No	\$35.00
PROCESSING & COMPLIANCE	William McNae	1	30.00	No	\$30.00
TRANSCRIPT - O&1-VID-WI	William McNae	103	4.80	No	\$494.40
CONDENSED TRANSCRIPT	William McNae	1	20.00	No	\$20.00
DIGITAL TRANSCRIPT-PDF-PTX	William McNae	1	35.00	No	\$35.00
PROCESSING & COMPLIANCE	William McNae	1	30.00	No	\$30.00
ON-SITE RESOURCE FEE		1	125.00	No	\$125.00
		1	0.00	No	\$0.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 4,567.15
Shipping Cost (FedEx) 49.50
Total \$4,616.65
Amount Due 4,616.65

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Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2478933**Invoice Date** 5/10/2023**Due Date** 6/9/2023**Amount Due** \$4,616.65

**Invoice INV2478933**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 5/10/2023
Terms Net 30
Due Date 6/9/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
4/26/2023	J9498182	miami, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA M

Description	Deponent	Qty	Unit Rate	Tax	Amount
APP FEE: FIRST HOUR	William McNae	1	95.00	No	\$95.00
APP FEE: ADDITIONAL HOURS	William McNae	7	50.00	No	\$350.00
APP FEE: ADDITIONAL HOURS OVERTIME	William McNae	5	100.00	No	\$500.00
TRANSCRIPT - O&1-VID-WI	William McNae	558	4.80	No	\$2,678.40
EXHIBITS W/TABS	William McNae	69	0.65	No	\$44.85
EXHIBITS COLOR	William McNae	73	1.50	No	\$109.50
CONDENSED TRANSCRIPT	William McNae	1	20.00	No	\$20.00
DIGITAL TRANSCRIPT-PDF-PTX	William McNae	1	35.00	No	\$35.00
PROCESSING & COMPLIANCE	William McNae	1	30.00	No	\$30.00
TRANSCRIPT - O&1-VID-WI	William McNae	103	4.80	No	\$494.40
CONDENSED TRANSCRIPT	William McNae	1	20.00	No	\$20.00
DIGITAL TRANSCRIPT-PDF-PTX	William McNae	1	35.00	No	\$35.00
PROCESSING & COMPLIANCE	William McNae	1	30.00	No	\$30.00
ON-SITE RESOURCE FEE		1	125.00	No	\$125.00
		1	0.00	No	\$0.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 4,567.15
Shipping Cost (FedEx) 49.50
Total \$4,616.65
Amount Due 4,616.65

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Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2478933**Invoice Date** 5/10/2023**Due Date** 6/9/2023**Amount Due** \$4,616.65

**Invoice INV2482060**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 5/15/2023
Terms Net 30
Due Date 6/14/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case			
4/28/2023	J9498184	miami, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MC			
Description		Deponent	Qty	Unit Rate	Tax	Amount
VIDEOGRAPHER MINIMUM		Ronda McNae	1	325.00	No	\$325.00
VIDEOGRAPHER ADDITIONAL HOURS		Ronda McNae	6	130.00	No	\$780.00
VIDEOGRAPHER ADDITIONAL HOURS OVERTIME		Ronda McNae	4	165.00	No	\$660.00

Subtotal 1,765.00
Shipping Cost (n/a) 0.00
Total \$1,765.00
Amount Due 1,765.00

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Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2482060**Invoice Date** 5/15/2023**Due Date** 6/14/2023**Amount Due** \$1,765.00

**Invoice INV2482060**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 5/15/2023
Terms Net 30
Due Date 6/14/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case			
4/28/2023	J9498184	miami, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MC			
Description		Deponent	Qty	Unit Rate	Tax	Amount
VIDEOGRAPHER MINIMUM		Ronda McNae	1	325.00	No	\$325.00
VIDEOGRAPHER ADDITIONAL HOURS		Ronda McNae	6	130.00	No	\$780.00
VIDEOGRAPHER ADDITIONAL HOURS OVERTIME		Ronda McNae	4	165.00	No	\$660.00

Subtotal 1,765.00
Shipping Cost (n/a) 0.00
Total \$1,765.00
Amount Due 1,765.00

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P. O. Box 846099
Dallas, TX 75284-6099

Federal Express, UPS or Overnight USPS:

Esquire Deposition Solutions, LLC
Lockbox 846099
1950 N. Stemmons Freeway
Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2482060**Invoice Date** 5/15/2023**Due Date** 6/14/2023**Amount Due** \$1,765.00

**Invoice INV2486889**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 5/19/2023
Terms Net 30
Due Date 6/18/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
4/28/2023	J9498184	miami, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MC

Description	Deponent	Qty	Unit Rate	Tax	Amount
APP FEE: FIRST HOUR		1	95.00	No	\$95.00
APP FEE: ADDITIONAL HOURS		6.5	50.00	No	\$325.00
APP FEE: ADDITIONAL HOURS OVERTIME		3.5	100.00	No	\$350.00
ON-SITE RESOURCE FEE		1	125.00	No	\$125.00
TRANSCRIPT - O&1-VID-WI	Ronda McNae REDACTED	490	4.80	No	\$2,352.00
EXHIBITS W/TABS	Ronda McNae REDACTED	299	0.65	No	\$194.35
DIGITAL TRANSCRIPT-PDF-PTX	Ronda McNae REDACTED	1	35.00	No	\$35.00
CONDENSED TRANSCRIPT	Ronda McNae REDACTED	1	20.00	No	\$20.00
PROCESSING & COMPLIANCE	Ronda McNae REDACTED	1	30.00	No	\$30.00
TRANSCRIPT - O&1-VID-WI	Ronda McNae CONFIDENTIAL	34	4.80	No	\$163.20
DIGITAL TRANSCRIPT-PDF-PTX	Ronda McNae CONFIDENTIAL	1	35.00	No	\$35.00
CONDENSED TRANSCRIPT	Ronda McNae CONFIDENTIAL	1	20.00	No	\$20.00
PROCESSING & COMPLIANCE	Ronda McNae CONFIDENTIAL	1	30.00	No	\$30.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 3,774.55
Shipping Cost (FedEx) 49.50
Total \$3,824.05
Amount Due 3,824.05

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1950 N. Stemmons Freeway
Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2486889**Invoice Date** 5/19/2023**Due Date** 6/18/2023**Amount Due** \$3,824.05

**Invoice INV2496981**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 5/31/2023
Terms Net 30
Due Date 6/30/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
5/17/2023	J9670439	Miami, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA M

Description	Deponent	Qty	Unit Rate	Tax	Amount
APP FEE: FIRST HOUR	Sirena Herd	1	95.00	No	\$95.00
APP FEE: ADDITIONAL HOURS	Sirena Herd	2	50.00	No	\$100.00
TRANSCRIPT - O&1-VC-WI	Sirena Herd	129	4.80	No	\$619.20
E- EXHIBITS COLOR ORIG	Sirena Herd	347	0.65	No	\$225.55
CONDENSED TRANSCRIPT	Sirena Herd	1	20.00	No	\$20.00
PROCESSING & COMPLIANCE	Sirena Herd	1	30.00	No	\$30.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 1,089.75
Shipping Cost (n/a) 0.00
Total \$1,089.75
Amount Due 1,089.75

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Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2496981**Invoice Date** 5/31/2023**Due Date** 6/30/2023**Amount Due** \$1,089.75

**Invoice INV2521281**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 6/30/2023
Terms Net 30
Due Date 7/30/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case			
6/12/2023	J9705468	Miami, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA MC			
Description		Deponent	Qty	Unit Rate	Tax	Amount
APP FEE: FIRST HOUR		Matthew Mead	1	95.00	No	\$95.00
APP FEE: ADDITIONAL HOURS		Matthew Mead	2	50.00	No	\$100.00
TRANSCRIPT - O&1-VID-VC-WI		Matthew Mead	155	5.20	No	\$806.00
CONDENSED TRANSCRIPT		Matthew Mead	1	20.00	No	\$20.00
PROCESSING & COMPLIANCE		Matthew Mead	1	30.00	No	\$30.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 1,051.00
Shipping Cost (n/a) 0.00
Total \$1,051.00
Amount Due 1,051.00

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Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2521281**Invoice Date** 6/30/2023**Due Date** 7/30/2023**Amount Due** \$1,051.00

**Invoice INV2523658**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 7/5/2023
Terms Net 30
Due Date 8/4/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
6/12/2023	J9705468	Miami, FLORIDA	MICHAEL J. FITZGERALD AND YELANY DE VARONA V. RONDA M

Description	Deponent	Qty	Unit Rate	Tax	Amount
REMOTE VIDEO FIRST 2 HOURS	Matthew Mead	1	250.00	No	\$250.00
REMOTE VIDEO HOURLY	Matthew Mead	1	125.00	No	\$125.00
DIGITAL MEDIA MPEG1	Matthew Mead	2.5	85.00	No	\$212.50
HANDLING FEE	Matthew Mead	1	25.00	No	\$25.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 612.50
Shipping Cost (n/a) 0.00
Total \$612.50
Amount Due 612.50

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Dallas, TX 75208

Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2523658**Invoice Date** 7/5/2023**Due Date** 8/4/2023**Amount Due** \$612.50

**Invoice INV2535078**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 7/19/2023
Terms Net 30
Due Date 8/18/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
7/14/2023	J9802776	Miami, FLORIDA	MICHAEL J. FITZGERALD V. RONDA MCNAE

Description	Deponent	Qty	Unit Rate	Tax	Amount
REMOTE VIDEO CANCEL	ABIGAIL LEONARD	1	250.00	No	\$250.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 250.00
Shipping Cost (n/a) 0.00
Total \$250.00
Amount Due 250.00

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Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2535078**Invoice Date** 7/19/2023**Due Date** 8/18/2023**Amount Due** \$250.00

**Invoice INV2535083**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 7/19/2023
Terms Net 30
Due Date 8/18/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
7/14/2023	J9802776	Miami, FLORIDA	MICHAEL J. FITZGERALD V. RONDA MCNAE

Description	Deponent	Qty	Unit Rate	Tax	Amount
CANCELLATION	ABIGAIL LEONARD	1	175.00	No	\$175.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 175.00
Shipping Cost (n/a) 0.00
Total \$175.00
Amount Due 175.00

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Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2535083**Invoice Date** 7/19/2023**Due Date** 8/18/2023**Amount Due** \$175.00

**Invoice INV2541724**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 07/27/2023
Terms Net 30
Due Date 08/26/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
07/13/2023	J9839013	, FLORIDA	MICHAEL J. FITZGERALD V. RONDA MCNAE

Description	Deponent	Qty	Unit Rate	Tax	Amount
APP FEE: FIRST HOUR	Patrice Sanchez	1	95.00	No	\$95.00
APP FEE: ADDITIONAL HOURS	Patrice Sanchez	4	50.00	No	\$200.00
TRANSCRIPT - O&1-VC-VID-WI	Patrice Sanchez	179	5.20	No	\$930.80
CONDENSED TRANSCRIPT	Patrice Sanchez	1	20.00	No	\$20.00
E-EXHIBITS B&W ORIG	Patrice Sanchez	66	0.65	No	\$42.90
E- EXHIBITS COLOR ORIG	Patrice Sanchez	7	0.65	No	\$4.55
PROCESSING & COMPLIANCE	Patrice Sanchez	1	30.00	No	\$30.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 1,323.25
Shipping Cost (n/a) 0.00
Total \$1,323.25
Amount Due 1,323.25

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Dallas, TX 75208

Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2541724**Invoice Date** 07/27/2023**Due Date** 08/26/2023**Amount Due** \$1,323.25

**Invoice INV2561834**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 8/21/2023
Terms Net 30
Due Date 9/20/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
7/26/2023	J10024721	Miami, FLORIDA	MICHAEL J. FITZGERALD V. RONDA MCNAE

Description	Deponent	Qty	Unit Rate	Tax	Amount
REMOTE VIDEO FIRST 2 HOURS	Abigail Leonard	1	250.00	No	\$250.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 250.00
Shipping Cost (n/a) 0.00
Total \$250.00
Amount Due 250.00

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Dallas, TX 75208

Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2561834**Invoice Date** 8/21/2023**Due Date** 9/20/2023**Amount Due** \$250.00

**Invoice INV2562144**

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 8/21/2023
Terms Net 30
Due Date 9/20/2023

Client Number C368108
Esquire Office Miami
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Services Provided For

Assouline & Berlowe - Miami
Gussin, Meredith J
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Job Date	Job ID	Job Location	Case
7/26/2023	J10024721	Miami, FLORIDA	MICHAEL J. FITZGERALD V. RONDA MCNAE

Description	Deponent	Qty	Unit Rate	Tax	Amount
APP FEE: FIRST HOUR OVERTIME	Abigail Leonard	1	140.00	No	\$140.00
APP FEE: ADDITIONAL HOURS OVERTIME	Abigail Leonard	1	100.00	No	\$100.00
TRANSCRIPT - O&1-VC-VID-WI	Abigail Leonard	111	5.20	No	\$577.20
CONDENSED TRANSCRIPT	Abigail Leonard	1	20.00	No	\$20.00
PROCESSING & COMPLIANCE	Abigail Leonard	1	30.00	No	\$30.00

Representing Client: Assouline & Berlowe (P) : Assouline & Berlowe - Miami

Subtotal 867.20
Shipping Cost (n/a) 0.00
Total \$867.20
Amount Due 867.20

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Dallas, TX 75284-6099

Federal Express, UPS or Overnight USPS:

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Lockbox 846099
1950 N. Stemmons Freeway
Suite 5010
Dallas, TX 75208

Client Name Assouline & Berlowe - Miami**Client #** C368108**Invoice #** INV2562144**Invoice Date** 8/21/2023**Due Date** 9/20/2023**Amount Due** \$867.20



1500 Centre Parkway
Suite 100
East Point, GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120
Remittance Dallas address/W9 please go to
www.EsquireConnect.com

Statement

Date 3/31/2023
Amount Due \$3,373.40
Amount Encl.
Client # C368108
AR Analyst Turner, Delores

Bill To

Assouline & Berlowe - Miami
100 Southeast 2nd Street
Suite 3105
Miami FL 33131

Date	Description	Case Name	Job #	Charge	Payment	Balance
01/01/2012	Balance Forward					0.00
2/8/2023	Invoice #INV2401925	MICHAEL J. FITZGERALD AND YELA...	J9121779	902.50		902.50
2/9/2023	Invoice #INV2402585	MICHAEL J. FITZGERALD AND YELA...	J9121779	345.00		1,247.50
3/31/2023	Invoice #INV2443436	BERNARDO GOENAGA V. DAMARYS	J9460255	2,125.90		3,373.40

Current	1-30 Days	31-60 Days	61-90 Days	Over 90 Days	Amount Due
2,125.90	1,247.50	0.00	0.00	0.00	\$3,373.40

Fiske Forensic Accounting



**FITZGERALD, MICHAEL
MEREDITH GUSSIN, ESQ.
ASSOULINE & BERLOWE, PA
MIAMI TOWER
100 SE 2ND STREET, SUITE 3105
MIAMI, FL 33131**

Invoice No. 33901

PAY HERE: <https://fiskeco.com/make-a-payment/>

Date 04/30/2023

Client No. 801006

For professional services rendered through 04/30/2023.

DATE	SERVICE	STAFF	HOURS	AMOUNT
04/11/2023	LITIGATION REVIEW COMPLAINT	CAPECE	1.30	\$ 338.00
04/19/2023	LITIGATION CONFERENCE CALL WITH MIKE AND ATTORNEYS	SCHULTZ	1.00	525.00
04/19/2023	LITIGATION REVIEW COMPLAINT	SCHULTZ	1.80	945.00
04/19/2023	LITIGATION MEETING W SHERI TO DISCUSS CASE / MEETING W ATTORNEY, CLIENT AND SHERI	CAPECE	1.40	364.00
04/20/2023	FORENSIC ACCOUNTING DOCUMENTS REVIEW & ANALYSIS	SCHERER	1.30	260.00
04/20/2023	LITIGATION REVIEW ANALYSIS	SCHULTZ	1.40	735.00
04/20/2023	LITIGATION REVIEW DOCS COLLECTED / PRELIM ANALYSIS / CALL W SHERI	CAPECE	3.90	1,014.00
04/21/2023	FORENSIC ACCOUNTING DOCUMENTS REVIEW AND ANALYSIS	SCHERER	2.70	540.00
04/21/2023	LITIGATION REVIEW ALL DOCUMENTS RECEIVED DISCUSS WHAT ADDITIONAL DOCUMENTS ARE NEEDED.	SCHULTZ	1.90	997.50
04/21/2023	LITIGATION REVIEW DOCS COLLECTED / PRELIM ANALYSIS AND QUESTIONS / MEETING W SHERI / CREATE DOC REQUEST	CAPECE	3.10	806.00
04/24/2023	LITIGATION DISCUSS THE ANALYSIS	SCHULTZ	0.30	157.50

FISKE & COMPANY
FITZGERALD, MICHAEL
Invoice No. 33901

Page 2

DATE	SERVICE	STAFF	HOURS	AMOUNT
04/27/2023	LITIGATION DAMAGE ANALYSIS / WRITE REPORT	CAPECE	3.80	988.00
04/28/2023	LITIGATION REVIEW DOCS COLLECTED / DAMAGE ANALYSIS / WRITE REPORT	CAPECE	2.10	<u>546.00</u>
			Invoice Amount	<u>\$ 8,216.00</u>

Payment is due by the 10th of each month.
Finance charges of 1.5% will be added to amounts outstanding past 30 days.
NOTE: Please insert client & invoice number on mailed checks.

A.P. FISKE, CPA, PA d/b/a Fiske & Company EIN # 26-1419740

Wire Transfer/ACH Deposit Instructions:

Fiske Account/
Wire Information:

A.P. FISKE, CPA, PA d/b/a Fiske & Company
Centennial Bank, Plantation, Florida
Please include the client/case name on all wiring information. Once initiated, please let us know by email or phone.
**Do not mail regular checks to the bank.*

Bank Contact:

Jonnine Morejon, SVP Bus Dev Officer / (754) 312-1665
jmorejon@my100bank.com

Deposit Type:

Checking

Account No:

502843045

ABA/Routing No:

082902757

Wire Swift Code:

CNTEUS44

Fiske & Company
1250 S. Pine Island Road | Suite 300
Plantation, Florida 33324
954.236.8600 | www.fiskeco.com



ALAINA FOTIU-WOJTOWICZ, ESQ.
BRODSKY FOTIU-WOJTOWICZ, PLLC
200 SE 1ST STREET, SUITE400

Invoice No. 34296

PAY HERE: <https://fiskeco.com/make-a-payment/>

Date 06/07/2023

Client No. 801006

For professional services rendered through 06/07/2023.

Michael J. Fitzgerald and Yaleny De Verona vs. Ronda McNae and William McNae

Deposition of Sheri Fiske Schultz:

June 7th, 2023 at 11pm- 2hrs @ \$575.00 \$ 1,150.00

**** the above fee has been paid prior to deposition ****

Deposition continuation over 2hrs: 1pm - 2:30 pm 1.5hrs @ \$575.00 \$ 862.50

Net Due \$ 862.50

NOTE: Please insert client & invoice number on mailed checks.

A.P. FISKE, CPA, PA d/b/a Fiske & Company EIN # 26-1419740

Wire Transfer/ACH Deposit Instructions:

**Fiske Account/
Wire Information:**

A.P. FISKE, CPA, PA d/b/a Fiske & Company
Centennial Bank, Plantation, Florida

Please include the client/case name on all wiring information. Once initiated, please let us know by email or phone.

**Do not mail regular checks to the bank.*

Bank Contact:

Jonnine Morejon, SVP Bus Dev Officer / (754) 312-1665
jmorejon@my100bank.com

Deposit Type:

Checking

Account No:

502843045

ABA/Routing No:

082902757

Wire Swift Code:

CNTEUS44

Fiske & Company
1250 S. Pine Island Road | Suite 300
Plantation, Florida 33324
954.236.8600 | www.fiskeco.com



**FITZGERALD, MICHAEL
MEREDITH GUSSIN, ESQ.
ASSOULINE & BERLOWE, PA
MIAMI TOWER
100 SE 2ND STREET, SUITE 3105
MIAMI, FL 33131**

Invoice No. 34455

PAY HERE: <https://fiskeco.com/make-a-payment/>

Date 06/30/2023

Client No. 801006

For professional services rendered through 06/30/2023.

DATE	SERVICE	STAFF	HOURS	AMOUNT
04/26/2023	LITIGATION DISCUSS DAMAGE ANALYSIS	SCHULTZ	0.30	\$ 157.50
05/15/2023	LITIGATION FINAL REVIEW OF REPORT	SCHULTZ	2.40	1,260.00
06/02/2023	LITIGATION REVIEW DEPO TRANSCRIPT OF FITZGERALD	SCHULTZ	3.20	1,680.00
06/02/2023	LITIGATION REVIEW DEPO BINDER AND TEAMS CALL WITH PETER TO DISCUSS DEPO	SCHULTZ	1.40	735.00
06/02/2023	LITIGATION MEETING W SHERI / PREPARE FOR DEPO / DEPO BINDER / MEETING W PETER AND SHERI	CAPECE	5.10	1,326.00
06/04/2023	LITIGATION REVIEW DEPO TRANSCRIPT OF FITZGERALD	SCHULTZ	2.80	1,470.00
06/05/2023	LITIGATION REVIEW BACKGROUND DOCUMENTS AND DISCUSS WITH GINO	SCHULTZ	1.50	787.50
06/05/2023	LITIGATION REVIEWING DEPOSITIONS	SCHULTZ	2.00	1,050.00
06/05/2023	LITIGATION ASSIST WITH PREPPING THE DEPOSITION BINDER	POLA	1.50	150.00
06/05/2023	LITIGATION PREPARE FOR DEPO / MEETINGS W SHERI	CAPECE	6.80	1,768.00
06/06/2023	LITIGATION UPDATED SCHEDULES BASED ON NEW INFORMATION	SCHULTZ	0.90	472.50

FISKE & COMPANY
FITZGERALD, MICHAEL
Invoice No. 34455

Page 2

DATE	SERVICE	STAFF	HOURS	AMOUNT
06/06/2023	LITIGATION CONFERENCE CALLS WITH MIKE AND ATTORNEYS; SEPARATELY	SCHULTZ	1.10	577.50
06/06/2023	LITIGATION PREPARATION FOR DEPOSITION	SCHULTZ	4.90	2,572.50
06/06/2023	LITIGATION MEETINGS W SHERI / TCALL W MIKE AND SHERI / UPDATE DAMAGES FOR UPDATED PSU INFORMATION / PREPARE FOR DEPO	CAPECE	7.40	1,924.00
06/07/2023	LITIGATION PREPARING FOR DEPOSITION	SCHULTZ	2.80	1,470.00
06/07/2023	LITIGATION DISCUSS DEPOSITION WITH COUNSEL	SCHULTZ	0.20	105.00
06/07/2023	LITIGATION PREPARE FOR DEPO	CAPECE	2.10	<u>546.00</u>
			Invoice Amount	18,051.50
			Prior Balance	<u>15,894.50</u>
			Net Due	<u>\$ 33,946.00</u>

Payment is due by the 10th of each month.
Finance charges of 1.5% will be added to amounts outstanding past 30 days.
NOTE: Please insert client & invoice number on mailed checks.

A.P. FISKE, CPA, PA d/b/a Fiske & Company EIN # 26-1419740

Wire Transfer/ACH Deposit Instructions:

Fiske Account/
Wire Information:

A.P. FISKE, CPA, PA d/b/a Fiske & Company
Centennial Bank, Plantation, Florida

Please include the client/case name on all wiring information. Once initiated, please let us know by email or phone.

**Do not mail regular checks to the bank.*

Bank Contact:

Jonnine Morejon, SVP Bus Dev Officer / (754) 312-1665
jmorejon@my100bank.com

Deposit Type:

Checking

Account No:

502843045

ABA/Routing No:

082902757

Wire Swift Code:

CNTEUS44

Fiske & Company
1250 S. Pine Island Road | Suite 300
Plantation, Florida 33324
954.236.8600 | www.fiskeco.com



FITZGERALD, MICHAEL
c/o MEREDITH GUSSIN, ESQ.
ASSOULINE & BERLOWE, PA
MIAMI TOWER
100 SE 2ND STREET, SUITE 3105
MIAMI, FL 33131

Invoice No. 35277

PAY HERE: <https://fiskeco.com/make-a-payment/>

Date 09/30/2023

Client No. 801006

For professional services rendered through 09/30/2023.

DATE	SERVICE	STAFF	HOURS	AMOUNT
07/07/2023	LITIGATION EMAIL COMMUNICATION TO ATTORNEY OFFICE FOR SHERI'S DEPOSITION TRANSCRIPTS	POLA	0.20 \$	20.00
09/28/2023	LITIGATION REVIEW RESPONSE	SCHULTZ	0.50	<u>282.50</u>
		Invoice Amount		302.50
		Prior Balance		<u>33,946.00</u>
		Net Due	\$	<u><u>34,248.50</u></u>

Payment is due by the 10th of each month.

Finance charges of 1.5% will be added to amounts outstanding past 30 days.

NOTE: Please insert client & invoice number on mailed checks.

A.P. FISKE, CPA, PA d/b/a Fiske & Company EIN # 26-1419740

Wire Transfer/ACH Deposit Instructions:

**Fiske Account/
Wire Information:**

A.P. FISKE, CPA, PA d/b/a Fiske & Company
Centennial Bank, Plantation, Florida

Please include the client/case name on all wiring information.

Once initiated, please let us know by email or phone.

**Do not mail regular checks to the bank.*

Bank Contact:

Jonnine Morejon, SVP Bus Dev Officer / (754) 312-1665
jmorejon@my100bank.com

Deposit Type:

Checking

Account No:

502843045

ABA/Routing No:

082902757

Wire Swift Code:

CNTEUS44

FISKE & COMPANY
FITZGERALD, MICHAEL
Invoice No. 35277

Page 2

DATE	SERVICE	STAFF	HOURS	AMOUNT
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Fiske & Company
1250 S. Pine Island Road | Suite 300
Plantation, Florida 33324
954.236.8600 | www.fiskeco.com



**FITZGERALD, MICHAEL
MEREDITH GUSSIN, ESQ.
ASSOULINE & BERLOWE, P.A.
100 SE 2ND STREET, SUITE 3105
MIAMI, FL 33131**

Invoice No. 38149

PAY HERE: <https://fiskeco.com/make-a-payment/>

Date 03/31/2025

Client No. 801006

For professional services rendered through 03/31/2025.

DATE	SERVICE	STAFF	HOURS	AMOUNT
03/11/2025	LITIGATION REVIEW SHERI'S DEPOSITION / PREPARE FOR TRIAL	CAPECE	6.10	\$ 1,769.00
03/12/2025	LITIGATION PREPARE FOR TRIAL	CAPECE	2.70	783.00
03/18/2025	LITIGATION PREPARE FOR TRIAL	CAPECE	1.70	493.00
03/20/2025	LITIGATION REVIEWING DEPO AND REPORT	SCHULTZ	3.50	2,187.50
03/26/2025	LITIGATION TEAMS CALL DISCUSSING TRIAL WITH ATTORNEYS AND GINO	SCHULTZ	1.20	750.00
03/26/2025	LITIGATION PREPARING POWERPOINT PRESENTATION AND PREPARING FOR TRIAL	SCHULTZ	3.50	2,187.50
03/26/2025	LITIGATION PREPARE FOR TRIAL / MEETING W PETER, MEREDITH, AND SHERI	CAPECE	2.30	667.00
03/27/2025	LITIGATION UPDATING PPT	SCHULTZ	1.00	625.00
03/27/2025	LITIGATION PREPARE FOR TRIAL	CAPECE	2.20	<u>638.00</u>
			Invoice Amount	\$ <u>10,100.00</u>

Payment is due within 15 days of this invoice.
Finance charges of 1.5% will be added to amounts outstanding past 15 days.

****PLEASE NOTE NEW NAME & ACCOUNT INFORMATION****

NOTE: You can also pay via check, please make checks payable to "Fiske Advisory, LLC".

FISKE ADVISORY, LLC
FITZGERALD, MICHAEL
Invoice No. 38149

Page 2

DATE	SERVICE	STAFF	HOURS	AMOUNT
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Please include Client Name & Invoice Number on mailed checks.

Fiske Advisory LLC EIN # 33-2348182

Wire Transfer/ACH Deposit Instructions:

Fiske Account:

Fiske Advisory LLC

Wire Information:

Centennial Bank, Plantation, Florida

Please include the client/case name on all wiring information. Once initiated, please let us know by email or phone.

**Do not mail regular checks to the bank.*

Bank Contact:

Jonnine Morejon, SVP Bus Dev Officer / (754) 312-1665

jmorejon@my100bank.com

Deposit Type:

Checking

Account No:

505496103

ABA/Routing No:

082902757

Wire Swift Code:

CNTEUS44

Fiske Advisory, LLC
1250 S. Pine Island Road | Suite 300
Plantation, Florida 33324
954.236.8600 | www.fiskeco.com



**FITZGERALD, MICHAEL
MEREDITH GUSSIN, ESQ.
ASSOULINE & BERLOWE, P.A.
100 SE 2ND STREET, SUITE 3105
MIAMI, FL 33131**

Statement Date 10/11/2024
Client No. 801006.0

<i>Invoice</i>	<i>Date</i>	<i>Description</i>	<i>Charge</i>	<i>Credit</i>	<i>Balance</i>
		Balance Forward			0.00
33901	04/30/2023	Invoice	8,216.00		8,216.00
	05/10/2023	Payment		8,216.00	0.00
34226	05/25/2023	Invoice	1,150.00		1,150.00
34263	05/31/2023	Invoice	15,894.50		17,044.50
	06/01/2023	Payment		1,150.00	15,894.50
34296	06/07/2023	Invoice	862.50		16,757.00
	06/08/2023	Payment		862.50	15,894.50
34455	06/30/2023	Invoice	18,051.50		33,946.00
35277	09/30/2023	Invoice	302.50		34,248.50
	10/19/2023	Payment		2,500.00	31,748.50
	11/20/2023	Payment		2,500.00	29,248.50
	01/17/2024	Payment		2,500.00	26,748.50
Current Balance				\$	26,748.50

0 - 30	31- 60	61 - 90	91 - 120	Over 120	Balance
0.00	0.00	0.00	0.00	26,748.50	\$ 26,748.50

Payment Due Date: Payment is due immediately upon receipt of this statement.

Late Fees: A 1.5% **finance charge** will be applied to any outstanding amounts beyond **15 days of last invoice date**.

Note: You can pay via check, please make checks payable to “Fiske & Company”.
Please include Client Name & Invoice Number on mailed checks.

A.P. FISKE, CPA, PA d/b/a Fiske & Company EIN # 26-1419740

Wire Transfer/ACH Deposit Instructions:

Fiske Account: A.P. FISKE, CPA, PA d/b/a Fiske & Company
Wire Information: Centennial Bank, Plantation, Florida
Please include the client/case name on all wiring information.
Once initiated, please let us know by email or phone.
**Do not mail regular checks to the bank.*
Bank Contact: Jonnine Morejon, SVP Bus Dev Officer / (754) 312-1665
jmorejon@my100bank.com
Deposit Type: Checking
Account No: 502843045
ABA/Routing No: 082902757
Wire Swift Code: CNTEUS44

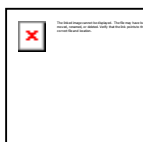
Fiske & Company
1250 S. Pine Island Road | Suite 300
Plantation, Florida 33324
954.236.8600 | www.fiskeco.com

**iMazing Device License
(For Dellinger Records)**

Peter E. Berlowe

From: Sarah Dellinger <info@equipcounseling.com>
Sent: Friday, February 3, 2023 4:20 PM
To: Kirsten I. Freiheit; Brenda K. Hooks
Subject: FW: Your DigiDNA receipt

From: DigiDNA (via Paddle.com) <help@paddle.com>
Sent: Thursday, February 2, 2023 7:44 AM
To: Sarah Dellinger <info@equipcounseling.com>
Subject: Your DigiDNA receipt



Your DigiDNA receipt

Receipt # 46526949

Amount Paid	Receipt Date	Payment Method
\$34.99	2nd February 2023	🍏 Pay 🍏 Pay

iMazing Device License - 1 device(s) (Qty: 1)	\$31.75
Sales Tax (10.2%)	\$3.24
Amount Paid	\$34.99

[View Receipt](#)

The \$34.99 payment will appear on your bank/card statement as:
PADDLE.NET* IMAZING

If you need help with your DigiDNA purchase, please contact us on paddle.net or
reply to this [email](#).

Thanks,
DigiDNA



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Paddle.com Market Ltd, Judd House, 18-29 Mora Street, London EC1V 8BT

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46526949

Your DigiDNA receipt
en

order-receipt

dd80901cd607444689864f619c9441c16f01732555c506ed2fc962d6e7943d239a007a5f

Ho, Dr. Judy

Dr. Judy Ho

 Clinical and Forensic Neuropsychologist

INVOICE

From

Dr. Judy Ho, Inc.

1600 Rosecrans Avenue

Media Center 4th Floor

Manhattan Beach, CA 90266

Invoice For

Assouline & Berlowe, P. A.

Miami Tower

100 SE 2nd Street, Suite 3105

Miami, Florida 33131

Invoice ID

104-0964

Issue Date

07/25/2023

Due Date

07/25/2023 (upon receipt)

Subject

Deposition for Fitzgerald v McNae

Item Type	Description	Quantity	Unit Price	Amount
Service	Deposition 2 hours - \$750/hr	1.00	\$1,500.00	\$1,500.00

Amount Due \$1,500.00

Dr. Judy Ho

 Clinical and Forensic Neuropsychologist

INVOICE

From

Dr. Judy Ho, Inc.

1600 Rosecrans Avenue

Media Center 4th Floor

Manhattan Beach, CA 90266

Invoice For

Assouline & Berlowe, P. A.

Miami Tower

100 SE 2nd Street, Suite 3105

Miami, Florida 33131

Invoice ID

104-0965

Issue Date

07/31/2023

Due Date

07/31/2023 (upon receipt)

Item Type	Description	Quantity	Unit Price	Amount
Service	Deposition - additional 45 minutes (\$750/hour)	1.00	\$562.50	\$562.50

Amount Due

\$562.50

Hopper, James "Jim"

James W. Hopper, Ph.D.
Psychological Consultation Services
9 Henderson Street
Arlington, MA 02474

Bill for: Sexual Assault Case, Fitzgerald vs. McNae

Bill to: Opposing counsel via Alaina Fotiu-Wojtowicz

Bill as of: July 21, 2023

Date	Work Activity	Time in hours	Charge at \$400 per hour
7/27/23	Deposition testimony	3.00	\$1,200
Total hours and cost:		3.00	\$1,200

James W. Hopper, Ph.D.
Psychological Consultation Services
9 Henderson Street
Arlington, MA 02474

Bill for: Sexual Assault Case, Fitzgerald vs. McNae

Bill to: Opposing counsel via Alaina Fotiu-Wojtowicz

Bill as of: July 27, 2023

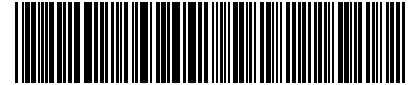
Date	Work Activity	Time in hours	Charge at \$400 per hour
7/27/23	Deposition testimony	1.00	\$400
		Total hours and cost:	1.00 \$400

Process Server, Inc. (PSI)

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2023000806
2/24/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL J FITZGERALD

Defendant:
RONDA MCNAE

Received: 1/31/2023 Served: 2/3/2023 3:12 pm .INDIVIDUAL/PERSONAL
To be served on: TAMI WAKASUGI

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
OUT OF STATE SVC.	1.00	150.00	150.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$150.00

BALANCE DUE: \$150.00

Comments pertaining to this invoice:

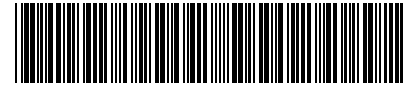
2/10/2023 7:56 pm PERSONALLY SERVED 2/3 - I SHOULD HAVE SIGNED ROS BY MONDAY

Please Include Invoice Number On Your Check.
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2023009330
2/3/2024



PETER E BERLOWE
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: Miami-Dade 2023-025855-CA-01

Plaintiff:
MICHAEL J FITZGERALD, individually,

Defendant:
WILLIAM MCNAE, individually,

Received: 11/14/2023 Served: 1/20/2024 11:23 pm .INDIVIDUAL/PERSONAL
To be served on: WILLIAM MCNAE

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
OUT OF STATE SVC.	1.00	158.00	158.00
ADDITIONAL ROUND OF ATTEMPTS	1.00	100.00	100.00
LOCATE	1.00	65.00	65.00
TOTAL CHARGED:			\$323.00

BALANCE DUE: \$323.00

Comments pertaining to this invoice:

11/18/2023 12:16 pm Attempted service at 504 11th Place, Kirkland, WA 98033. No answer at the door. I could hear people moving around inside. Also I saw someone peek through the closed blinds. I could not get a good visual. There were Two vehicles present. WA plate # BMW2920 & RAM truck WA CC5365V
GPS Coordinates: 47.6843314, -122.1992097

11/21/2023 7:33 pm Attempted service at 504 11th Place, Kirkland, WA 98033. No answer at the door. Lights are on inside. House is very lit up inside. Blinds are shut. Christmas lights are on. No one will come to the door or speak to me through the door.

11/22/2023 8:34 am Attempted service at 504 11th Place, Kirkland, WA 98033. No answer at the door. Dark and quiet. Blinds are shut. Dog inside. Same two vehicles are parked outside.

11/29/2023 6:13 pm KK emailed server for update.

11/30/2023 2:04 pm ON HOLD. Server is holding the process. She believes on all 3 attempts someone was home, KK tried to run the tags but Washington State does not allow me access to that information. Please advise as to how you wish to proceed.

12/12/2023 5:30 pm per MEREDITH: We have received confirmation that 504 11TH PLACE is the correct address. What time of day is the process server going there? We know he works at Microsoft, so I assume he goes to/from work? Also, kids go to school so perhaps we have someone camp out there in the morning and wait for someone to leave for work/school?

KK to Meredith process server went on Saturday at 1216 pm No answer at the door. I could hear people moving around inside. Also I saw someone peek through the closed blinds. I could not get a good visual. There were Two vehicles present. WA plate # BMW2920 & RAM truck WA CC5365V
Second attempt was on a Tuesday night at 7:33 pm Same cars, no answer at door. Lights are on inside. House is very lit up inside. Blinds are shut. Christmas lights are on. No one will come to the door or speak to me through the door.

INVOICE

2/3/2024

Third attempt was on a Wednesday at 8:34 am - same care present, 11/22/2023 8:34 am Attempted service at 504 11th Place, Kirkland, WA 98033. No answer at the door. Dark and quiet. Blinds are shut. Dog inside.

I will ask KIRKLAND SERVER for additional round of attempts and ask what they charge for wait time. To me it sounds like there were people home on every attempt and just don't want to answer door. I think Peter asked me for tags- I can't run Washington State plates (must be protected info per their state). Can you ask Peter if he was able to get them run - if its their cars we know its a good address.

12/14/2023 3:44 pm ##### kk internal notes ##### per JULIANA ALVAREZ Thank you so much. I'll defer to Peter. We are aware the wife lives there but wonder maybe the husband moved out? It's just speculation at this point. Peter please let Kristina know if we should have the process server go out there and do wait time

I called server she said 115.00 per hour. . . I had it wrong. She said she said she does not think wait time will work (if she's doing it because they know her car) the house is set back, so to watch it, you kind of have to pull into their land (in other words no place to really hide). She also does not think another round of additional attempts will work. They won't answer the door. Does Our defendant have a job? We could try a work address?

1/3/2024 4:20 pm Or we can try another process server Or sheriff's civil, if you just want another round of attempts. If I send it to civil and give them the tags we saw, they may be able to run them.
1/6/2024 1:50 pm per Meredith move forward with service - KK sending out for additional attempts
I was asked to do an additional round of attempts.

Today, another unsuccessful attempt at 504 11TH PLACE, KIRKLAND, WA 98033 No answer at the door. I heard a dog barking inside. I heard movement in the house. The dog stopped barking after the first knock then was silent with my continued knocks. I yelled out to whomever was inside, I had a delivery. They Ignored me. There was a Black Dodge ram truck WA C65369V parked in the driveway. In my opinion this is an avoidance case. I will continue efforts.

GPS Coordinates: 47.6836135, -122.1993729

GPS Timestamp: 1704577856905

1/15/2024 11:45 am On todays attempt, when I pulled up I noticed someone through the window. The light was on. It appeared they noticed me. I went to the door and knocked several times. No answer. I noticed the blinds moving in a window next to the door. Dogs barked when I began knocking and quit on my second knock. I announced loudly that I had a delivery. No response. As I was walking back to my vehicle the person in the window was gone (too far away, and not able to make out a description). There was a Black BMW with WA plate #BWS2920 present at time of attempt.

1/20/2024 11:23 am I Personally served the defendant today at 504 11th Place, Kirkland, WA 98033. At time of service, a man stepped out of the house when I walked up. I quickly told him who I was looking for. He said, he wasn't home. Retreatted back inside and slammed the door. I placed a contact card near the door. As I was walking away, the man stepped out again. He said, Okay it's me just give me the paperwork. I advised him of the contents of the process and endorsed the summons with date, time and my credentials. Mr. Mcnae accepted the process s in hand. Approximate physical description:

Age: 40

Ethnicity: Caucasian

Gender: Male

Weight: 200

Height: 5'10"

Hair: Brown

GPS Coordinates: 47.6830828, -122.2004658

GPS Timestamp: 1705778581701

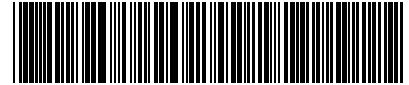
Please Include Invoice Number On Your Check.

WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2023000804
2/23/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL J FITZGERALD

Defendant:
RONDA MCNAE

Received: 1/31/2023 Served: 2/4/2023 1:53 pm .INDIVIDUAL/PERSONAL
To be served on: SIRENA HERD

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
OUT OF STATE SVC.	1.00	150.00	150.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$150.00

BALANCE DUE: \$150.00

Comments pertaining to this invoice:

2/10/2023 7:49 pm PERSONALLY SERVED ON 2/4 - I SHOULD HAVE SIGNED ROS BY MONDAY -KK

Please Include Invoice Number On Your Check.
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2022009576
1/12/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL J FITZGERALD

Defendant:
RONDA MCNAE

Received: 12/22/2022 Served: 1/4/2023 1:22 pm .INDIVIDUAL/PERSONAL
To be served on: SARAH DELLINGER (EQUIP COUNSELING, PPLC)

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
SUBPOENA - WASHINGTON	1.00	150.00	150.00
2ND ADDRESS OUT OF STATE	1.00	130.00	130.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$280.00

BALANCE DUE: \$280.00

Comments pertaining to this invoice:

12/23/2022 4:06 pm KK EMAILED FOR STATUS
12/27/2022 5:36 pm KK TO MYRIAM they were not able to get into office on friday due to weather, server has in hand and will be attempting, now.
12/28/2022 10:31 am KK TO SERVER: please call the below phone number. If Sara Dellinger is not there, you can serve any representative of Equip. Subpoena is only for records not a testimony.

EQUIP Counseling Counselor in Kirkland, Washington
Located in: Longhouse Offices
Address: 10829 NE 68th St, Kirkland, WA 98033

Phone: (206) 202-2832 ***
12/28/2022 1:16 pm Attempted: 10829 NE 68th St Ste D , , Kirkland, WA 98033
Door closed with "Do Not Disturb" sign. Called 206-202-2832. Received a Non-ID voicemail. I left a message with my phone number stating business. I left my contact information on the door. Only vehicle present in parking lot: BUC1055
12/29/2022 5:25 pm KK SKIPPED THIS IS POSSIBLY A HOME ADDRESS MS SARAH H DELLINGER AKA SARAH HIEMSTRA 8204 NE 110TH PL, KIRKLAND, WA 98034-3546 KING

I TOLD SERVER TO TRY IT, BECAUSE THE WORK PLACE IS A LOCKED DOOR, IT HAS "EQUIP" LOGO ON IT, DO NOT DISTURB WAS THERE ON FIRST ATTEMPT, SERER CARD WAS LEFT AND WAS STILL THERE ON SECOND ATTEMPT - MAYBE THEY ARE CLOSED FOR HOLIDAY VACATION? NO RETURN PHONE CALLS.
1/3/2023 10:42 am KK TO SERVER... ANY LUCK AT THE HOME ADDRESS? #9576 SARAH H DELLINGER.
1/3/2023 2:29 pm 12/30/2022 - RING BELL CAMERA, SMALL DOG INSIDE, BARKING, NO RESPONSE AT DOOR, one vehicle in driveway WA TAG# CEP 9254 and one on street WA TAG# BHM 1900 at 8204 NE 110TH PL, KIRKLAND, WA 98034 - SERVER HAS ON ROUTE AGAIN FOR TODAY.
1/3/2023 8:30 am WASHINGTON DISPATCH. We had no luck but this is going out for service again today
1/3/2023 12:29 pm Address Attempted: 8204 NE 110th Pl , , Kirkland, WA 98034 Per her husband/ co-resident registered

INVOICE

1/12/2023

1/10/2023 11:25 am agent is currently not at home, gave her phone number of 206-992-3154.
1/11/2023 11:28 am KK to server have you had any luck obtaining service on Sarah Dellinger at home or work address?
per server.... This was served and left with Sarah Dellinger, RA, on 1/4/2023, at 1:22 PM at the home
address of 8204 NE 110TH PLACE, KIRKLAND WA 98034 by Server Leslie Alexander

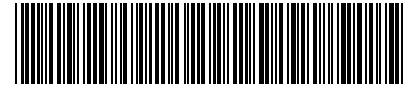
SARAH DELLINGER Desc: Female, 39 y/o, 6'3", 155 lbs., white skin, brown hair, brown eyes

KK TO SERVER WE NEED THE SIGNED AFFIDAVIT ON THIS ONE AND THE ONE FOR BROCK
WEEDMAN. ALSO FINAL INVOICES.

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2022009579
1/3/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL J FITZGERALD

Defendant:
RONDA MCNAE

Received: 12/22/2022 Served: 1/3/2023 1:42 pm .INDIVIDUAL/PERSONAL
To be served on: BROCK WEEDMAN

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
SUBPOENA - WASHINGTON	1.00	150.00	150.00
2ND ADDRESS OUT OF STATE SVC.	1.00	130.00	130.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$280.00

BALANCE DUE: \$280.00

Comments pertaining to this invoice:

12/23/2022 4:09 pm KK TO SERVER.... Just checking on update for subpoenas to SARA DELLINGER & BROCK WEEDMAN I know you are having terrible weather, we can talk on Tuesday the 27th, Merry Christmas.

12/27/2022 5:33 pm KK TO MYRIAM they were not able to get into office on friday due to weather, server has in hand and will be attempting, now.

12/28/2022 10:17 am Date: 12/27/2022
Time: 4:03 PM
Address Attempted: 2820 Northup Way Ste 105, , Bellevue, WA 98004
suite is open lights are on but nobody in the office

12/28/2022 10:20 am HE IS A PSYCHIATRIST Brock B. Weedman, PSY
Located in: NORTHUP WEST
Address: 2820 Northup Way, Bellevue, WA 98004
Phone: (425) 213-2848

12/28/2022 3:56 pm KK gave number to server to call him.
Date: 12/28/2022
Time: 11:53 AM
Address Attempted: 2820 Northup Way Ste 105, , Bellevue, WA 98004
Address is office for @4-5 psychologists, N/A at reception window, no hours or directions, locked doors, quiet. Called 425.213.2848 from business card in lobby, M voice on VM for witness: Left VM stating business w/my name&ph#.

12/29/2022 5:34 pm KK SKIPPED FOR HOME ADDRESS ON WEEDMAN

HE IS A/K/A MR BROCK BRANDON WEEDMAN (48) | 2820 NORTHUP WAY STE 105, BELLEVUE, WA 98004-1438 KING - THE OFFICE ADDRESS CAME UP AND SO DID THIS SAME DOB SAME SOCIAL ... PLEASE TRY THIS ALTERNATE ADDRESS.

MR BROCK B WEEDMAN (Male) (48) SECOND ADDRESS.... 1300 REDMOND PL NE, RENTON, WA 98056-3382 KING

INVOICE

1/3/2023

Dates Seen: (Aug 2004 - Dec 2022)

(425) 572-1160 (PST) - (Mar 2006 - Dec 2022)

Name: WEEDMAN BROCK

Listing Phone: (425) 572-1160 ***** THIS IS A NEW NUMBER- TRY IT ALSO...

Listing Name: WEEDMAN BROCK

Published

1/3/2023	10:43 am	KK TO SERVER- ANY LUCK AT THE HOME ADDRESS? #9579 BROCK WEEDMAN.
1/3/2023	2:33 pm	DISPATCH IS CHECKING ON THIS AND WILL GET BACK TO ME -KK

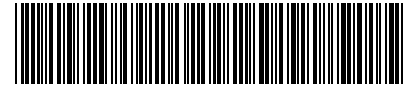
Please Include Invoice Number On Your Check.

WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2022009579
1/12/2023
Original Date: 1/3/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL J FITZGERALD

Defendant:
RONDA MCNAE

Received: 12/22/2022 Served: 1/3/2023 1:42 pm .INDIVIDUAL/PERSONAL
To be served on: BROCK WEEDMAN

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
SUBPOENA - WASHINGTON	1.00	150.00	150.00
2ND ADDRESS OUT OF STATE SVC.	1.00	130.00	130.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$280.00

BALANCE DUE: \$280.00

Comments pertaining to this invoice:

12/23/2022 4:09 pm KK TO SERVER.... Just checking on update for subpoenas to SARA DELLINGER & BROCK WEEDMAN I know you are having terrible weather, we can talk on Tuesday the 27th, Merry Christmas.

12/27/2022 5:33 pm KK TO MYRIAM they were not able to get into office on friday due to weather, server has in hand and will be attempting, now.

12/28/2022 10:17 am Date: 12/27/2022
Time: 4:03 PM
Address Attempted: 2820 Northup Way Ste 105, , Bellevue, WA 98004
suite is open lights are on but nobody in the office

12/28/2022 10:20 am HE IS A PSYCHIATRIST Brock B. Weedman, PSY
Located in: NORTHUP WEST
Address: 2820 Northup Way, Bellevue, WA 98004
Phone: (425) 213-2848

12/28/2022 3:56 pm KK gave number to server to call him.
Date: 12/28/2022
Time: 11:53 AM
Address Attempted: 2820 Northup Way Ste 105, , Bellevue, WA 98004
Address is office for @4-5 psychologists, N/A at reception window, no hours or directions, locked doors, quiet. Called 425.213.2848 from business card in lobby, M voice on VM for witness: Left VM stating business w/my name&ph#.

12/29/2022 5:34 pm KK SKIPPED FOR HOME ADDRESS ON WEEDMAN

HE IS A/K/A MR BROCK BRANDON WEEDMAN (48) | 2820 NORTHUP WAY STE 105, BELLEVUE, WA 98004-1438 KING - THE OFFICE ADDRESS CAME UP AND SO DID THIS SAME DOB SAME SOCIAL ... PLEASE TRY THIS ALTERNATE ADDRESS.

MR BROCK B WEEDMAN (Male) (48) SECOND ADDRESS.... 1300 REDMOND PL NE, RENTON, WA 98056-3382 KING

INVOICE

1/12/2023

Dates Seen: (Aug 2004 - Dec 2022)

(425) 572-1160 (PST) - (Mar 2006 - Dec 2022)

Name: WEEDMAN BROCK

Listing Phone: (425) 572-1160 ***** THIS IS A NEW NUMBER- TRY IT ALSO...

Listing Name: WEEDMAN BROCK

Published

1/3/2023 10:43 am KK TO SERVER- ANY LUCK AT THE HOME ADDRESS? #9579 BROCK WEEDMAN.

1/3/2023 2:33 pm DISPATCH IS CHECKING ON THIS AND WILL GET BACK TO ME -KK

1/3/2023 4:46 pm SERVED TODAY, at office address ... WAITING ON ROS GP

This was served personally yesterday at 1:42 PM by Ken Roswold

Desc: Male, 46-50 y/o, 5'7-6'0", 161-180 Lbs., Caucasian, gray/white

We'll close out the job and send you the declaration the soonest it is signed.

1/11/2023 12:44 pm KK TO SERVER WE NEED THE SIGNED AFFIDAVIT ON THIS ONE BROCK WEEDMAN TOO.
ALSO FINAL INVOICES.

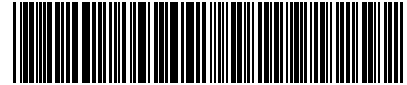
Please Include Invoice Number On Your Check.

WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2023001770
3/14/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL J FITZGERALD AND YELANY DE VARONA

Defendant:
RONDA MCNAE AND WILLIAM MCNAE

Received: 3/7/2023 Served: 3/13/2023 10:25 am .PUBLIC AGENCY
To be served on: NORTHWEST UNIVERSITY RICK ENGSTROM, ED.D, VP STUDENT DEVELOPMENT

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
OUT OF STATE SVC.	1.00	150.00	150.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$150.00

BALANCE DUE: \$150.00

Comments pertaining to this invoice:

3/9/2023 5:11 pm *** UPDATE*** PER SERVER: Regarding Mr. Engstrom, this address is for a School. They are on Spring Break until next Monday. I will try back then.

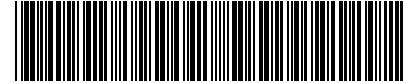
Please Include Invoice Number On Your Check.
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2023001769
12/10/2024

Original Date: 3/9/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL FITZGERALD AND YELANY DE VARONA

Defendant:
RONDA MCNAE AND WILLIAM MCNAE

Received: 3/7/2023 Served: 3/8/2023 10:02 am .INDIVIDUAL/PERSONAL
To be served on: AZAIAH CAREW

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
OUT OF STATE SVC.	1.00	150.00	150.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$150.00

BALANCE DUE: \$150.00

Comments pertaining to this invoice:

3/9/2023 5:13 pm Personally served her yesterday at residential address- return of service is uploaded.

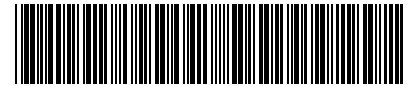
Please Include Invoice Number On Your Check.
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2023001770
12/10/2024

Original Date: 3/14/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL FITZGERALD AND YELANY DE VARONA

Defendant:
RONDA MCNAE AND WILLIAM MCNAE

Received: 3/7/2023 Served: 3/13/2023 10:25 am .PUBLIC AGENCY
To be served on: NORTHWEST UNIVERSITY RICK ENGSTROM, ED.D, VP STUDENT DEVELOPMENT

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
OUT OF STATE SVC.	1.00	150.00	150.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$150.00

BALANCE DUE: \$150.00

Comments pertaining to this invoice:

3/9/2023 5:11 pm *** UPDATE*** PER SERVER: Regarding Mr. Engstrom, this address is for a School. They are on Spring Break until next Monday. I will try back then.

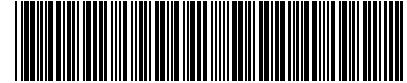
Please Include Invoice Number On Your Check.
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2023003694
12/10/2024

Original Date: 5/18/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL FITZGERALD AND YELANY DE VARONA

Defendant:
RONDA MCNAE AND WILLIAM MCNAE

Received: 5/8/2023 Served: 5/18/2023 10:34 am .CORPORATE
To be served on: CHURCHOME R/A TROY ANDERSON

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
OUT OF STATE SVC.	1.00	150.00	150.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$150.00

BALANCE DUE: \$150.00

Comments pertaining to this invoice:

5/15/2023 1:51 pm Job: 3694 - UNSUCCESSFUL ATTEMPT - Per P.S. Andrew Webster 9051 132ND AVE NE, KIRKLAND, WA 98033, KING
Access to office at church is behind secure doors. They have a Ring doorbell to contact them but I was unable to get an answer after several rings. There is a chat feature on their website I was able to contact someone who works in the office who stated that the majority of the office is working remote and there may not be anyone in there today. He stated the Registered Agent's name is actually Troy not Roy Anderson (PSI typo- KK fixed). He gave me his phone number 425-803-2390, which I called and left a voice mail for Mr Anderson. Will continue efforts.

GPS Coordinates: 47.684286, -122.1651518
GPS Timestamp: 1684183915614
ref# 8847109
5/15/2023 4:26 pm Server got a call back from R/A Troy, he said he will be in the office this THURSDAY, MAY 18 between 8:30- 10:30, server is making arrangements to meet with him then for service.
5/17/2023 1:08 pm kk sent reminder to server about his appointment with the r/a tomorrow.
5/18/2023 1:48 pm served today - details to follow 9051 132ND AVE NE, KIRKLAND, WA 98033, KING

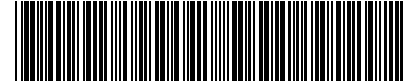
Please Include Invoice Number On Your Check.
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2023003749
12/10/2024

Original Date: 5/15/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL FITZGERALD AND YELANY DE VARONA

Defendant:
RONDA MCNAE AND WILLIAM MCNAE

Received: 5/9/2023 Served: 5/11/2023 3:18 pm .CORPORATE - REGISTERED AGENT
To be served on: MICROSOFT CORPORATION R/A CORPORATION SERVICE COMPANY

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
OUT OF STATE SVC.	1.00	150.00	150.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$150.00

BALANCE DUE: \$150.00

Comments pertaining to this invoice:

5/12/2023 12:01 pm Service effected at 300 DESCHUTES WAY SW SUITE 208, TUMWATER, WA 98501, to: ELLEN JONES, Customer service associate / authorized agent
Age: 60
Ethnicity: Caucasian
Gender: Female
Weight: 110
Height: 5'5"
Hair: Brown
5/15/2023 6:34 pm kk sent affidavit to server for signature
5/17/2023 12:51 pm !!!As soon as we get executed affidavit back on Microsoft email to EO
EO@AssoulineBerlowe.com

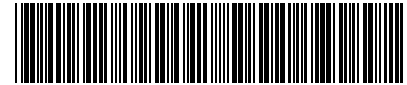
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255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2023003750
12/10/2024

Original Date: 6/12/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL FITZGERALD AND YELANY DE VARONA

Defendant:
RONDA MCNAE AND WILLIAM MCNAE

Received: 5/30/2023 Non-Served: 6/8/2023 .NON-SERVE - COMMENTS
To be served on: PATRICE SANCHEZ

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
2ND ADDRESS	1.00	120.00	120.00
OUT OF STATE SVC.	1.00	150.00	150.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$270.00

BALANCE DUE: \$270.00

Comments pertaining to this invoice:

5/9/2023 2:01 pm Attempted service at 1800 4th Street UNIT 219, Austin, TX 78702. unable to gain access to building. First floor is all independent businesses and cannot find leasing a office., there's no way to enter residential floors without a fob key.

5/15/2023 7:01 pm STILL TRYING at 1800 4th Street Unit 219, Austin, TX 78702, This building is locked. Have to wait for someone to come or go to gain access. Still attempting have not been able to access building 2 attempts.

5/15/2023 7:01 pm The server stated: "I could not find a call box or directory. This is an independently owned condo above a store front and there is no onsite leasing."

5/15/2023 7:01 pm Attempted service at 1800 4th Street UNIT 219, Austin, TX 78702. I was unable to access building. No one coming or going from locked property stairways, no leasing office on site and no place to leave information card.

5/24/2023 4:38 pm Called the subject at number provided, good number, left detailed voice mail and waiting for subject to contact me back, I am unable to enter condo building without fob access.

5/25/2023 2:25 pm Per server 5/24/2023 4:38 pm Called subject at number provided, good number, left a detailed voicemail and waiting for subject to contact me back, I am unable to enter condo building without fob access

5/25/2023 3:00 pm kk to meredith, this subpoena dated for today 5/25 is to produce documents, if we get service on her we can just tell her to please call you about the date. The server is unable to access the building the phone number is good, but shes not returning calls. do you know where she works? Maybe we could try there?

5/26/2023 3:46 pm Per Peter and Meredith - looks like she moved from given address in October, 2022 please now try new address of

1100 S. LAMAR BLVD.
APT 1538, AUSTIN, TX 78704

5/26/2023 11:50 am kk will get second address to Texas server. Attempted service at 1800 4th Street UNIT 219, Austin, TX 78702. I am unable to gain access to the building. There is no foot traffic coming in or out of the multiple access doors. I have called and texted the subject multiple times. The subject's phone goes straight to voice mail and she has not responded to my texts.

INVOICE

12/10/2024

5/30/2023	1:26 pm	KK checking status on Patrice, to see in any Luck over the weekend, at the new address. Left message.
5/31/2023	1:46 pm	Attempted service at 1100 S. Lamar Blvd. Unit 1538, Austin, TX 78704. *** PLEASE NOTE correct unit number is 1538 NOT 1518. The subjects unit number was confirmed by the leasing office. I spoke with a white male resident who said that the subject is not home until late afternoon. The subjects unit is only accessible through the leasing office which closes at 6:00 pm
6/1/2023	8:59 am	Attempted service at 1100 S. Lamar Blvd. Unit 1538, Austin, TX 78704. There was no answer at the front door. I could hear dogs barking inside. The provided phone number goes straight to voice mail.
6/3/2023	9:41 am	Attempted service at 1100 S. Lamar Blvd. Unit 1538, Austin, TX 78704. There was no answer at the front door. I could hear dogs barking inside. The subject has not responded to any of my calls or texts.
6/6/2023	1:30 pm	KK TO SERVER: The attorney is re-setting the dates so we can keep trying at the new address. Please stand down for now. We will get new docs to you
6/8/2023	8:56 am	Attempted service at 1100 S. Lamar Blvd. Unit 1538, Austin, TX 78704. There was no answer at the front door. I could hear dogs barking inside. The subject has not responded to any of my calls or texts.
6/12/2023	1:32 pm	Jobs are being closed out. When client sends over new jobs we will enter as new.

Please Include Invoice Number On Your Check.

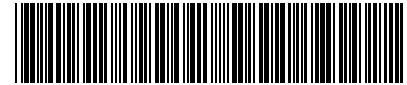
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2023003751
12/10/2024

Original Date: 6/12/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL FITZGERALD AND YELANY DE VARONA

Defendant:
RONDA MCNAE AND WILLIAM MCNAE

Received: 5/30/2023 Non-Served: 6/8/2023 .NON-SERVE - COMMENTS
To be served on: PATRICE SANCHEZ

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
2ND ADDRESS TEXAS	1.00	120.00	120.00
OUT OF STATE SVC.	1.00	150.00	150.00
WITNESS FEE CHECK	1.00	0.00	0.00
WITNESS FEE ADVANCE	1.00	4.00	4.00
2ND ADDRESS Texas	1.00	120.00	120.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$394.00

BALANCE DUE: \$394.00

Comments pertaining to this invoice:

5/9/2023 2:01 pm Attempted service at 1800 4th Street UNIT 219, Austin, TX 78702. unable to gain access to building. First floor is all independent businesses and cannot find leasing a office., there's no way to enter residential floors without a fob key.

5/15/2023 7:01 pm STILL TRYING at 1800 4th Street Unit 219, Austin, TX 78702, This building is locked. Have to wait for someone to come or go to gain access. Still attempting have not been able to access building 2 attempts.

5/15/2023 7:01 pm The server stated: "I could not find a call box or directory. This is an independently owned condo above a store front and there is no onsite leasing."

5/17/2023 2:05 pm Attempted service at 1800 4th Street UNIT 219, Austin, TX 78702. I was unable to access building. No one coming or going from locked property stairways, no leasing office on site and no place to leave information card.

5/24/2023 4:38 pm per attorney try calling witness Patrice Sanchez. (210) 393-1830 her phone number Called subject at number provided, good number, left a detailed voicemail and waiting for subject to contact me back, I am unable to enter condo building without fob access

5/25/2023 3:00 pm kk to meredith, this subpoena for appearance is dated 6/9 The server is unable to access the building the phone number is good, but shes not returning calls. do you know where she works? Maybe we could try there?

5/26/2023 11:50 am Attempted service at 1800 4th Street UNIT 219, Austin, TX 78702. I am unable to gain access to the building. There is no foot traffic coming in or out of the multiple access doors. I have called and texted the subject multiple times. The subject's phone goes straight to voice mail and she has not responded to my texts.

5/26/2023 3:43 pm Per Peter and Meredith - looks like she moved from given address in Ocober, 2022 please now try new address of

1100 S. LAMAR BLVD.
APT 1538, AUSTIN, TX 78704

kk will get second address to Texas server.

INVOICE

12/10/2024

5/30/2023	1:27 pm	KK checking status on Patrice, to see in any Luck over the weekend, at the new address. Left message.
5/31/2023	1:46 pm	Attempted service at 1100 S. Lamar Blvd. Unit 1538, Austin, TX 78704. The subjects unit number is actually Apt 1538 not 1518. I spoke with white male resident who said that the subject is not home until late afternoon. The subjects unit is only accessible through the leasing office which closes at 6:00 pm
6/1/2023	8:59 am	Attempted service at 1100 S. Lamar Blvd. Unit 1538, Austin, TX 78704. There was no answer at the front door. I could hear dogs barking inside. The provided phone number goes straight to voice mail.
6/3/2023	9:41 am	Attempted service at 1100 S. Lamar Blvd. Unit 1538, Austin, TX 78704. There was no answer at the front door. I could hear dogs barking inside. The subject has not responded to any of my calls or texts.
6/6/2023	1:31 pm	KK TO SERVER: The attorney is re-setting the dates so we can keep trying at the new address. Please stand down for now. We will get new docs to you, (you can use the same 40.00 check for her wit fee).
6/8/2023	8:56 am	Attempted service at 1100 S. Lamar Blvd. Unit 1538, Austin, TX 78704. There was no answer at the front door. I could hear dogs barking inside. The subject has not responded to any of my calls or texts.
6/12/2023	1:33 pm	Jobs are being closed out. When client sends over new jobs we will enter as new.

Please Include Invoice Number On Your Check.

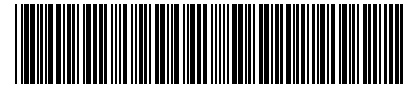
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2023005194
12/10/2024

Original Date: 6/27/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL FITZGERALD AND YELANY DE VARONA

Defendant:
RONDA MCNAE AND WILLIAM MCNAE

Received: 6/19/2023 Served: 6/21/2023 5:51 pm .INDIVIDUAL/PERSONAL
To be served on: PATRICE SANCHEZ

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
OUT OF STATE SVC. TX	1.00	150.00	150.00
WITNESS FEE CHECK	1.00	40.00	40.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$190.00

BALANCE DUE: \$190.00

Comments pertaining to this invoice:

6/22/2023 2:07 pm KK TO MEREDITH - we got Patrice Sanchez Personally ! woo hoo ! Just waiting on signed return.

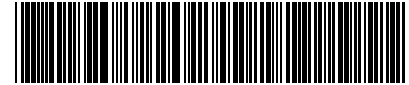
SERVED PATRICE SANCHEZ on Jun 21 2023 5:51PM at 1100 SOUTH LAMAR BLVD., APT 1538,
AUSTIN, Travis County, TX 78704

Please Include Invoice Number On Your Check.
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2023000807
3/2/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL J FITZGERALD

Defendant:
RONDA MCNAE

Received: 1/31/2023 Non-Served: 2/10/2023 .NON-SERVE - COMMENTS
To be served on: AZAIAH CAREW

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
OUT OF STATE SVC.	1.00	150.00	150.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$150.00

BALANCE DUE: \$150.00

Comments pertaining to this invoice:

Date: 2/3/2023
Time: 3:00 PM
Address Attempted: 10104 NE 60th St, , Kirkland, WA 98033
address is an apartment complex, need unit #

Date: 2/10/2023
Time: 1:58 PM
Address Attempted: 10104 NE 60th St Apt 116, , Kirkland, WA 98033
moved out 5 years ago per white male 80s

2/3/2023 9:00 am incomplete address need unit number.
2/10/2023 2:40 pm SENT TO SERVER GP
AZAIAH CAREW PLEASE ATTEMPT:

Current Home Address:
10104 NE 60th St, Unit 116
Kirkland WA 98033

2/10/2023 7:52 pm CONFIRMED AZAIAH CAREW MOVED FROM THIS ADDRESS, FIVE YEARS AGO.

Please Include Invoice Number On Your Check.
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2022005183
7/22/2022



PETER E BERLOWE
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 22-CV-22171-JEM

Plaintiff:
MICHAEL J FITZGERALD

Defendant:
RONDA MCNAE

Received: 7/15/2022 Served: 7/16/2022 11:05 am .INDIVIDUAL/PERSONAL
To be served on: RONDA MCNAE

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
RUSH OUT OF STATE	1.00	180.00	180.00
2ND ADDRESS RUSH	1.00	100.00	100.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$280.00

BALANCE DUE: \$280.00

Comments pertaining to this invoice:

7/15/2022 4:55 pm RUSH SERVICE... 504 11TH PLACE, KIRKLAND, WA 98033 (THIS IS A HOUSE)

SERVER GOT THIS MORNING WITH THE INSTRUCTIONS THAT IT IS A RUSH SERVICE ...
MEANING FIRST ATTEMPT MADE WITHIN 24 HOURS... CLIENT DID NOT SAY SERVICE NEEDED
TO BE ATTEMPTED IMMEDIATELY.

ALSO, CLIENT JUST GAVE SECOND ADDRESS:

7033 124TH AVENUE NE. ,KIRKLAND WA 98033 (HUSBANDS HOUSE - THEY DONT LIVE
TOGETHER?)

7/16/2022 10:50 am Address Attempted: Does not reside at 7033 124th Ave NE, Kirkland, WA 98033
Spoke with the current resident who stated the subject does not live here.

7/16/2022 11:05 am Service effected at 504 11TH PLACE, KIRKLAND, WA 98033 - PERSONALLY SERVED

7/18/2022 8:37 am KK RECEIVED A VOICE MAIL FROM PROCESS SERVER- SHE WAS PERSONALLY SERVED
SATURDAY AT 11:05 AM, I AM WAITING ON SIGNED RETURN. I BELIEVE SHE WAS SERVED AT
THE FIRST ADDRESS, I WILL CLARIFY WHEN THEIR OFFICE OPENS.

Please Include Invoice Number On Your Check.
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2022009807
1/3/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL J FITZGERALD

Defendant:
RONDA MCNAE

Received: 12/29/2022 Served: 12/29/2022 10:00 pm .INDIVIDUAL/PERSONAL
To be served on: LILY VASQUEZ

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
SUBPOENA	1.00	150.00	150.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$150.00

BALANCE DUE: \$150.00

Comments pertaining to this invoice:

12/29/2022 5:05 pm KK TO AZ SERVER.... * RUSH* PANTS ON FIRE, NEED TO GET ER ATTEMPTED ASAP. ***
FLORIDA RULES (FED COURT PERSONAL SVC. CANT SERVE ON A SUNDAY)

KK TO JUSTIN THIS IS NEW ADDRESS FOR LILY VASQUEZ (YOU HAD HER BEFORE ON SAME
CASE) YOU HAD HER BEFORE GOING TO "4401"

PLEASE TELL HER SUBPOENA IS NOT FOR DEPO JUST DOCS. LILY called me back FROM
602-432-4774, I explained everything, she said her correct address is "4402" NORTH 46TH PLACE,
PHOENIX AZ 85018

12/30/2022 3:37 pm SERVER IN ARIZONA RECEIVED, I EMAILED FOR UPDATE-KK
PAID SERVER RUSH, NOT BILLING CLIENT RUSH

1/3/2023 10:39 am KK TO SERVER ANY LUCK AT "4402" N 46TH PLACE

1/3/2023 2:21 pm THIS IS SECOND ADDRESS.

Please Include Invoice Number On Your Check.
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2022009111
12/19/2022



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL J FITZGERALD

Defendant:
RONDA MCNAE

Received: 12/7/2022 Non-Served: 12/12/2022 .NON-SERVE - COMMENTS
To be served on: LILY VASQUEZ

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
SUBPOENA	1.00	150.00	150.00
TOTAL CHARGED:			\$150.00

BALANCE DUE: \$150.00

Comments pertaining to this invoice:

12/12/22- This address doesn't exist, no 4401 N. 46th Place, closest house # is 4411, no Vasquez's own any property on this street, per the assessor's office, a Lily Vasquez owns a house at 3927 W DESERT COVE AVE, PHOENIX, 85029, we'll put this service on hold for further instructions at this time.

12/13/2022 5:52 pm OUT OF TIME. NEED NEW ADDRESS AND NEW COURT DATE TO CONTINUE.- KK

12/15/2022 3:14 pm server sent over wrong ros...del-rios ... we still need Lilly

12/15/2022 5:24 pm PER MYRIAM The public records search show Ms. Vazquez's telephone numbers: (SEE IF WE CAN GET HER TO TELL US HER ADDRESS)

602-432-4774 - kk called number it is an aoutmated voiuce messaging system, does not identify who you are calling I left a message aksing if this is correct number for lily please call me back.

602-840-0622 - this in not a working number.

12/15/2022 6:28 pm LILY called me back FROM 602-432-4774, I explained everything, she said her correct address is "4402" NORTH 46TH PLACE, PHOENIX AZ 85018 - KK PLEASE PREPARE NEW SUBPOENA AND WE WILL GET IT OUT.

Please Include Invoice Number On Your Check.
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2022009499
12/28/2022



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL J FITZGERALD

Defendant:
RONDA MCNAE

Received: 12/20/2022 Served: 12/28/2022 1:00 pm .CORPORATE
To be served on: ONSITE WORKSHOPS

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
OUT OF STATE SVC.	1.00	150.00	150.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$150.00

BALANCE DUE: \$150.00

Comments pertaining to this invoice:

12/23/2022 4:03 pm kk emailed server for status they are having very bad weather also
12/27/2022 5:30 pm per server they are now getting up and running again from the snow, address is in the mountains he
thinks he should be able to get there tomorrow.

Please Include Invoice Number On Your Check.
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

STATEMENT

3/3/2023

MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Phone: (305) 567-5576
Fax: (305) 567-9343

Statement covers Unpaid Invoices through 3/3/2023.

CASE: 1:22-CV-22171-JEM REFERENCE:

MICHAEL J FITZGERALD AND YELANY DE VARONA vs RONDA MCNAE AND WILLIAM MCNAE

Invoice	Client Job Number	Inv. Date	Person Served	Amount	Status
2022009111		12/19/2022	VASQUEZ, LILY	\$150.00	PAST 60
SUBPOENA		1.00	150.00	\$150.00	
2022009499		12/28/2022	ONSITE WORKSHOPS	\$150.00	PAST 60
OUT OF STATE SVC.		1.00	150.00	\$150.00	
Tax		1.00	0.00	\$0.00	
2022009576		1/12/2023	DELLINGER, SARAH	\$280.00	PAST 30
SUBPOENA -		1.00	150.00	\$150.00	
WASHINGTON					
2ND ADDRESS OUT OF		1.00	130.00	\$130.00	
STATE					
Tax		1.00	0.00	\$0.00	
2022009579		1/3/2023	WEEDMAN, BROCK	\$280.00	PAST 30
SUBPOENA -		1.00	150.00	\$150.00	
WASHINGTON					
2ND ADDRESS OUT OF		1.00	130.00	\$130.00	
STATE SVC.					
Tax		1.00	0.00	\$0.00	
2022009807		1/3/2023	VASQUEZ, LILY	\$150.00	PAST 30
SUBPOENA		1.00	150.00	\$150.00	
Tax		1.00	0.00	\$0.00	
2023000804		2/23/2023	HERD, SIRENA	\$150.00	Current
OUT OF STATE SVC.		1.00	150.00	\$150.00	
Tax		1.00	0.00	\$0.00	
2023000805		2/22/2023	SAMETTI, ALI	\$150.00	Current
OUT OF STATE SVC.		1.00	150.00	\$150.00	
Tax		1.00	0.00	\$0.00	
2023000806		2/24/2023	WAKASUGI, TAMI	\$150.00	Current
OUT OF STATE SVC.		1.00	150.00	\$150.00	
Tax		1.00	0.00	\$0.00	
2023000807		3/2/2023	CAREW, AZAIAH	\$150.00	Current
OUT OF STATE SVC.		1.00	150.00	\$150.00	
Tax		1.00	0.00	\$0.00	

Case Amount Due: \$1,610.00

TOTAL CHARGES: \$1,610.00

STATEMENT: ASSOULINE & BERLOWE PA

3/3/2023

Invoice	Client Job Number	Inv. Date	Person Served	Amount	Status
TOTAL PAYMENTS:				\$0.00	
TOTAL AMOUNT DUE:				\$1,610.00	
Current: \$600.00 Past 30: \$710.00 Past 60: \$300.00 Past 90: \$0.00 Past 120: \$0.00					

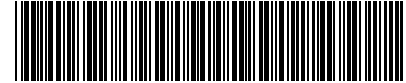
WE APPRECIATE YOUR BUSINESS, PLEASE INCLUDE INVOICE NUMBER WITH YOUR CHECK

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2022009111
3/3/2023

Original Date: 12/19/2022



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL J FITZGERALD AND YELANY DE VARONA

Defendant:
RONDA MCNAE AND WILLIAM MCNAE

Received: 12/7/2022 Non-Served: 12/12/2022 .NON-SERVE - COMMENTS
To be served on: LILY VASQUEZ

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
SUBPOENA	1.00	150.00	150.00
TOTAL CHARGED:			\$150.00

BALANCE DUE: \$150.00

Comments pertaining to this invoice:

12/12/22- This address doesn't exist, no 4401 N. 46th Place, closest house # is 4411, no Vasquez's own any property on this street, per the assessor's office, a Lily Vasquez owns a house at 3927 W DESERT COVE AVE, PHOENIX, 85029, we'll put this service on hold for further instructions at this time.

12/13/2022 5:52 pm OUT OF TIME. NEED NEW ADDRESS AND NEW COURT DATE TO CONTINUE.- KK

12/15/2022 3:14 pm server sent over wrong ros...del-rios ... we still need Lilly

12/15/2022 5:24 pm PER MYRIAM The public records search show Ms. Vazquez's telephone numbers: (SEE IF WE CAN GET HER TO TELL US HER ADDRESS)

602-432-4774 - kk called number it is an aoutmated voicue messaging system, does not identify who you are calling I left a message aksing if this is correct number for lily please call me back.

602-840-0622 - this in not a working number.

12/15/2022 6:28 pm LILY called me back FROM 602-432-4774, I explained everything, she said her correct address is "4402" NORTH 46TH PLACE, PHOENIX AZ 85018 - KK PLEASE PREPARE NEW SUBPOENA AND WE WILL GET IT OUT.

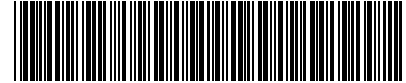
Please Include Invoice Number On Your Check.
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2022009499
3/3/2023

Original Date: 12/28/2022



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL J FITZGERALD AND YELANY DE VARONA

Defendant:
RONDA MCNAE AND WILLIAM MCNAE

Received: 12/20/2022 Served: 12/28/2022 1:00 pm .CORPORATE
To be served on: ONSITE WORKSHOPS

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
OUT OF STATE SVC.	1.00	150.00	150.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$150.00

BALANCE DUE: \$150.00

Comments pertaining to this invoice:

12/23/2022 4:03 pm kk emailed server for status they are having very bad weather also
12/27/2022 5:30 pm per server they are now getting up and running again from the snow, address is in the mountains he
thinks he should be able to get there tomorrow.

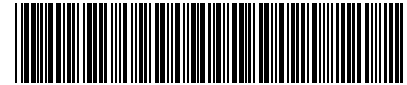
Please Include Invoice Number On Your Check.
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2022009576
3/3/2023

Original Date: 1/12/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL J FITZGERALD AND YELANY DE VARONA

Defendant:
RONDA MCNAE AND WILLIAM MCNAE

Received: 12/22/2022 Served: 1/4/2023 1:22 pm .INDIVIDUAL/PERSONAL
To be served on: SARAH DELLINGER (EQUIP COUNSELING, PPLC)

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
SUBPOENA - WASHINGTON	1.00	150.00	150.00
2ND ADDRESS OUT OF STATE	1.00	130.00	130.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$280.00

BALANCE DUE: \$280.00

Comments pertaining to this invoice:

12/23/2022 4:06 pm KK EMAILED FOR STATUS
12/27/2022 5:36 pm KK TO MYRIAM they were not able to get into office on friday due to weather, server has in hand and will be attempting, now.
12/28/2022 10:31 am KK TO SERVER: please call the below phone number. If Sara Dellinger is not there, you can serve any representative of Equip. Subpoena is only for records not a testimony.

EQUIP Counseling Counselor in Kirkland, Washington
Located in: Longhouse Offices
Address: 10829 NE 68th St, Kirkland, WA 98033

Phone: (206) 202-2832 ***
12/28/2022 1:16 pm Attempted: 10829 NE 68th St Ste D, , Kirkland, WA 98033
Door closed with "Do Not Disturb" sign. Called 206-202-2832. Received a Non-ID voicemail. I left a message with my phone number stating business. I left my contact information on the door. Only vehicle present in parking lot: BUC1055
12/29/2022 5:25 pm KK SKIPPED THIS IS POSSIBLY A HOME ADDRESS MS SARAH H DELLINGER AKA SARAH HIEMSTRA 8204 NE 110TH PL, KIRKLAND, WA 98034-3546 KING

I TOLD SERVER TO TRY IT, BECAUSE THE WORK PLACE IS A LOCKED DOOR, IT HAS "EQUIP" LOGO ON IT, DO NOT DISTURB WAS THERE ON FIRST ATTEMPT, SERER CARD WAS LEFT AND WAS STILL THERE ON SECOND ATTEMPT - MAYBE THEY ARE CLOSED FOR HOLIDAY VACATION? NO RETURN PHONE CALLS.
1/3/2023 10:42 am KK TO SERVER... ANY LUCK AT THE HOME ADDRESS? #9576 SARAH H DELLINGER.
1/3/2023 2:29 pm 12/30/2022 - RING BELL CAMERA, SMALL DOG INSIDE, BARKING, NO RESPONSE AT DOOR, one vehicle in driveway WA TAG# CEP 9254 and one on street WA TAG# BHM 1900 at 8204 NE 110TH PL, KIRKLAND, WA 98034 - SERVER HAS ON ROUTE AGAIN FOR TODAY.
1/3/2023 8:30 am WASHINGTON DISPATCH. We had no luck but this is going out for service again today
1/3/2023 12:29 pm Address Attempted: 8204 NE 110th Pl, , Kirkland, WA 98034 Per her husband/ co-resident registered agent is currently not at home, gave her phone number of 206-992-3154.
1/10/2023 11:25 am KK to server have you had any luck obtaining service on Sarah Dellinger at home or work address?

INVOICE

3/3/2023

1/11/2023 11:28 am per server.... This was served and left with Sarah Dellinger, RA, on 1/4/2023, at 1:22 PM at the home address of 8204 NE 110TH PLACE, KIRKLAND WA 98034 by Server Leslie Alexander

SARAH DELLINGER Desc: Female, 39 y/o, 6'3", 155 lbs., white skin, brown hair, brown eyes

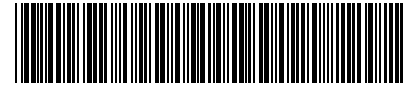
KK TO SERVER WE NEED THE SIGNED AFFIDAVIT ON THIS ONE AND THE ONE FOR BROCK WEEDMAN. ALSO FINAL INVOICES.

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2022009579
3/3/2023

Original Date: 1/3/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL J FITZGERALD AND YELANY DE VARONA

Defendant:
RONDA MCNAE AND WILLIAM MCNAE

Received: 12/22/2022 Served: 1/3/2023 1:42 pm .INDIVIDUAL/PERSONAL
To be served on: BROCK WEEDMAN

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
SUBPOENA - WASHINGTON	1.00	150.00	150.00
2ND ADDRESS OUT OF STATE SVC.	1.00	130.00	130.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$280.00

BALANCE DUE: \$280.00

Comments pertaining to this invoice:

12/23/2022 4:09 pm KK TO SERVER.... Just checking on update for subpoenas to SARA DELLINGER & BROCK WEEDMAN I know you are having terrible weather, we can talk on Tuesday the 27th, Merry Christmas.

12/27/2022 5:33 pm KK TO MYRIAM they were not able to get into office on friday due to weather, server has in hand and will be attempting, now.

12/28/2022 10:17 am Date: 12/27/2022
Time: 4:03 PM
Address Attempted: 2820 Northup Way Ste 105, , Bellevue, WA 98004
suite is open lights are on but nobody in the office

12/28/2022 10:20 am HE IS A PSYCHIATRIST Brock B. Weedman, PSY
Located in: NORTHUP WEST
Address: 2820 Northup Way, Bellevue, WA 98004
Phone: (425) 213-2848

12/28/2022 3:56 pm KK gave number to server to call him.
Date: 12/28/2022
Time: 11:53 AM
Address Attempted: 2820 Northup Way Ste 105, , Bellevue, WA 98004
Address is office for @4-5 psychologists, N/A at reception window, no hours or directions, locked doors, quiet. Called 425.213.2848 from business card in lobby, M voice on VM for witness: Left VM stating business w/my name&ph#.

12/29/2022 5:34 pm KK SKIPPED FOR HOME ADDRESS ON WEEDMAN

HE IS A/K/A MR BROCK BRANDON WEEDMAN (48) | 2820 NORTHUP WAY STE 105, BELLEVUE, WA 98004-1438 KING - THE OFFICE ADDRESS CAME UP AND SO DID THIS SAME DOB SAME SOCIAL ... PLEASE TRY THIS ALTERNATE ADDRESS.

MR BROCK B WEEDMAN (Male) (48) SECOND ADDRESS.... 1300 REDMOND PL NE, RENTON, WA 98056-3382 KING
Dates Seen: (Aug 2004 - Dec 2022)

INVOICE

3/3/2023

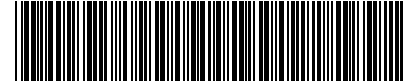
(425) 572-1160 (PST) - (Mar 2006 - Dec 2022)
Name: WEEDMAN BROCK
Listing Phone: (425) 572-1160 ***** THIS IS A NEW NUMBER- TRY IT ALSO...
Listing Name: WEEDMAN BROCK
Published
1/3/2023 10:43 am KK TO SERVER- ANY LUCK AT THE HOME ADDRESS? #9579 BROCK WEEDMAN.
1/3/2023 2:33 pm DISPATCH IS CHECKING ON THIS AND WILL GET BACK TO ME -KK
1/3/2023 4:46 pm SERVED TODAY, at office address ... WAITING ON ROS GP
This was served personally yesterday at 1:42 PM by Ken Roswold
Desc: Male, 46-50 y/o, 5'7-6'0", 161-180 Lbs., Caucasian, gray/white
We'll close out the job and send you the declaration the soonest it is signed.
1/11/2023 12:44 pm KK TO SERVER WE NEED THE SIGNED AFFIDAVIT ON THIS ONE BROCK WEEDMAN TOO.
ALSO FINAL INVOICES.

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2022009807
3/3/2023

Original Date: 1/3/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL J FITZGERALD AND YELANY DE VARONA

Defendant:
RONDA MCNAE AND WILLIAM MCNAE

Received: 12/29/2022 Served: 12/29/2022 10:00 pm .INDIVIDUAL/PERSONAL
To be served on: LILY VASQUEZ

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
SUBPOENA	1.00	150.00	150.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$150.00

BALANCE DUE: \$150.00

Comments pertaining to this invoice:

12/29/2022 5:05 pm KK TO AZ SERVER.... * RUSH* PANTS ON FIRE, NEED TO GET ER ATTEMPTED ASAP. ***
FLORIDA RULES (FED COURT PERSONAL SVC. CANT SERVE ON A SUNDAY)

KK TO JUSTIN THIS IS NEW ADDRESS FOR LILY VASQUEZ (YOU HAD HER BEFORE ON SAME
CASE) YOU HAD HER BEFORE GOING TO "4401"

PLEASE TELL HER SUBPOENA IS NOT FOR DEPO JUST DOCS. LILY called me back FROM
602-432-4774, I explained everything, she said her correct address is "4402" NORTH 46TH PLACE,
PHOENIX AZ 85018

12/30/2022 3:37 pm SERVER IN ARIZONA RECEIVED, I EMAILED FOR UPDATE-KK
PAID SERVER RUSH, NOT BILLING CLIENT RUSH

1/3/2023 10:39 am KK TO SERVER ANY LUCK AT "4402" N 46TH PLACE

1/3/2023 2:21 pm THIS IS SECOND ADDRESS.

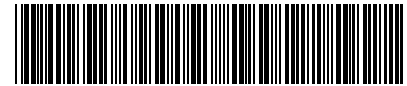
Please Include Invoice Number On Your Check.
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2023000804
3/3/2023

Original Date: 2/23/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL J FITZGERALD AND YELANY DE VARONA

Defendant:
RONDA MCNAE AND WILLIAM MCNAE

Received: 1/31/2023 Served: 2/4/2023 1:53 pm .INDIVIDUAL/PERSONAL
To be served on: SIRENA HERD

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
OUT OF STATE SVC.	1.00	150.00	150.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$150.00

BALANCE DUE: \$150.00

Comments pertaining to this invoice:

2/10/2023 7:49 pm PERSONALLY SERVED ON 2/4 - I SHOULD HAVE SIGNED ROS BY MONDAY -KK

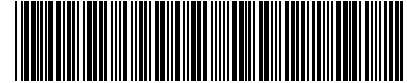
Please Include Invoice Number On Your Check.
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2023000805
3/3/2023

Original Date: 2/22/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL J FITZGERALD AND YELANY DE VARONA

Defendant:
RONDA MCNAE AND WILLIAM MCNAE

Received: 1/31/2023 Served: 2/10/2023 6:21 pm .SUBSTITUTE - RESIDENTIAL
To be served on: ALI SAMETTI

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
OUT OF STATE SVC.	1.00	150.00	150.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$150.00

BALANCE DUE: \$150.00

Comments pertaining to this invoice:

Date: 2/3/2023
Time: 2:48 PM
Address Attempted: 12317 NE 75th St, , Kirkland, WA 98033
no answer, dark and quiet, ring doorbell / camera at door

Date: 2/6/2023
Time: 10:28 AM
Address Attempted: 12317 NE 75th St, , Kirkland, WA 98033
Per contractor in C79038N, they should be moved back in tomorrow or Wednesday.

Date: 2/9/2023
Time: 10:45 AM
Address Attempted: 12317 NE 75th St, , Kirkland, WA 98033
No answer, quiet. One light visible in rear of ground floor. Pegged middle right
2/10/2023 7:51 pm ** UPDATE ADDRESS IS GOOD, THEY WERE OUT OF TOWN BUT APPEAR TO BE BACK, NO ONE WOULD COMR TO THE DOOR.

2/13/2023 2:28 pm KK TO SERVER PLEASE TRY AGAIN THIS SATURDAY
SERVED TO HUSBAND, WHO STATED DEFENDANT WAS BUSY WITH CHILD, SHE KNOWS ABOUT SUBPOENA I WILL ACCEPT ON HER BEHALF.

2/10/2023 6:21 pm Served Artie Sametti, Co-rez, Husband on 2/10/2023, at 6:21 PM by Leslie Alexander
Desc: Male, 31-35 y/o, 5'7-6'0", 141-160 Lbs., Caucasian, Black hair, brown eyes

2/22/2023 5:25 pm received ROS

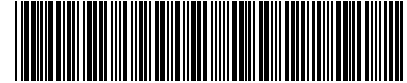
Please Include Invoice Number On Your Check.
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2023000806
3/3/2023

Original Date: 2/24/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL J FITZGERALD AND YELANY DE VARONA

Defendant:
RONDA MCNAE AND WILLIAM MCNAE

Received: 1/31/2023 Served: 2/3/2023 3:12 pm .INDIVIDUAL/PERSONAL
To be served on: TAMI WAKASUGI

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
OUT OF STATE SVC.	1.00	150.00	150.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$150.00

BALANCE DUE: \$150.00

Comments pertaining to this invoice:

2/10/2023 7:56 pm PERSONALLY SERVED 2/3 - I SHOULD HAVE SIGNED ROS BY MONDAY

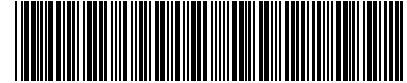
Please Include Invoice Number On Your Check.
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Process Server Inc.
255 E. Dania Beach Blvd.
#219
Dania Beach, FL 33004
Phone: (954) 929-9909
Fax: (954) 929-9905
65-1119131

INVOICE

Invoice #JAC-2023000807
3/3/2023

Original Date: 3/2/2023



MEREDITH J GUSSIN
ASSOULINE & BERLOWE PA
100 SE 2ND STREET
SUITE 3105
MIAMI, FL 33131

Case Number: 1:22-CV-22171-JEM

Plaintiff:
MICHAEL J FITZGERALD AND YELANY DE VARONA

Defendant:
RONDA MCNAE AND WILLIAM MCNAE

Received: 1/31/2023 Non-Served: 2/10/2023 .NON-SERVE - COMMENTS
To be served on: AZAIAH CAREW

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
OUT OF STATE SVC.	1.00	150.00	150.00
Tax	1.00	0.00%	0.00
TOTAL CHARGED:			\$150.00

BALANCE DUE: \$150.00

Comments pertaining to this invoice:

Date: 2/3/2023
Time: 3:00 PM
Address Attempted: 10104 NE 60th St, , Kirkland, WA 98033
address is an apartment complex, need unit #

Date: 2/10/2023
Time: 1:58 PM
Address Attempted: 10104 NE 60th St Apt 116, , Kirkland, WA 98033
moved out 5 years ago per white male 80s

2/3/2023 9:00 am incomplete address need unit number.

2/10/2023 2:40 pm SENT TO SERVER GP
AZAIAH CAREW PLEASE ATTEMPT:
Current Home Address:
10104 NE 60th St, Unit 116
Kirkland WA 98033

2/10/2023 7:52 pm CONFIRMED AZAIAH CAREW MOVED FROM THIS ADDRESS, FIVE YEARS AGO.

Please Include Invoice Number On Your Check.
WE APPRECIATE YOUR BUSINESS! FROM KRIS K AND STAFF (kk@chapter48.com) TAX ID #65-1119131

Southern District of Florida
Clerk and Court Reporter

ST44 Rev. 04/18
Derived from AO44 Rev. 04/18UNITED STATES DISTRICT COURT
For the Southern District of California

INVOICE 1580

MAKE CHECKS PAYABLE TO:Peter Emerson Berlowe
Assouline & Berlowe, P.A.
100 Southeast Second Street, Suite 3105
Miami, FL 33131
(305) 567-5576 Fax: (305) 567-9343
peb@assoulineberlowe.comJames C Pence-Aviles, RMR, CRR
Official Court Reporter
333 West Broadway, Suite 420
San Diego, CA 92101
(619) 587-0173
james_penceaviles@casd.uscourts.gov☐ CRIMINAL ☒ CIVILDATE ORDERED:
04-12-2023DATE DELIVERED:
04-15-2023**In the matter of:** 1:22-CV-22171-JEM, Michael J. Fitzgerald, et al. v Ronda McNae, et al.Transcript of proceedings heard before Magistrate Judge Jacqueline Becerra on Wednesday, April 5, 2023.
Transcribed from Digital Audio Recording.

CATEGORY	ORIGINAL			1 ST COPY			2 ND COPY			TOTAL CHARGES
	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	
Ordinary										
14-Day										
Expedited										
3-Day	36	5.45	196.20							196.20
Daily										
Hourly										
Realtime										
Misc.	Misc. Charges									
Subtotal										196.20
Less Discount for Late Delivery										
Tax (If Applicable)										
Date: 04-12-2023		Check: 30056					Less Amount of Deposit			272.50
Date: 04-15-2023		Check:					Total Refund			76.30
Total Due										0.00

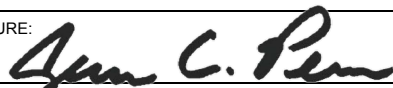
ADDITIONAL INFORMATION

Full price may be charged only if the transcript is delivered within the required time frame. For example, if an order for expedited transcript is not completed and delivered within (7) calendar days, payment would be at the 14-day delivery rate, and if not completed and delivered within 14 days, payment would be at the ordinary delivery rate.

CERTIFICATION

I certify that the transcript fees charged and page format used comply with the requirements of this court and the Judicial Conference of the United States.

SIGNATURE:



DATE:

4-15-23

DISTRIBUTION:

TO PARTY (2 copies - 1 to be returned with payment)

COURT REPORTER

COURT REPORTER SUPERVISOR

Peter E. Berlowe

From: do_not_reply@psc.uscourts.gov
Sent: Thursday, July 14, 2022 5:18 PM
To: Peter E. Berlowe
Subject: Pay.gov Payment Confirmation: FLORIDA SOUTHERN DISTRICT COURT

Your payment has been successfully processed and the details are below. If you have any questions or you wish to cancel this payment, please contact: Financial Section at 305-523-5050.

Account Number: 2739043
Court: FLORIDA SOUTHERN DISTRICT COURT
Amount: \$402.00
Tracking Id: AFLSDC-15791598
Approval Code: 04100G
Card Number: *****5091
Date/Time: 07/14/2022 05:18:03 ET

NOTE: This is an automated message. Please do not reply

Steinotype, Inc. Court Reporters



INVOICE

Steinotype, Inc.
PO Box 531108
Miami Shores, Florida 33153-1108
United States

Mobile: 305.632.4464
www.steinotype.com

BILL TO
Assouline & Berlowe, P.A.
Meredith Gussin, Esq.
100 SE 2nd Street, Suite 3105
Miami, Florida 33131
United States

EO@assoulineberlowe.com

Invoice Number: 23-156

P.O./S.O. Number: McNae - LWS

Invoice Date: July 20, 2023

Payment Due: August 19, 2023

Amount Due (USD): \$967.75

[Pay Securely Online](#)

Description	Quantity	Rate	Amount
Videotaped Deposition of Michael DiTomasso, Ph.D. taken on July 11, 2023. In re: Fitzgerald vs. McNae	1	\$0.00	\$0.00
Certified Copy	245	\$3.75	\$918.75
eTranscript	1	\$35.00	\$35.00
Exhibits (Marked)	7	\$2.00	\$14.00

Subtotal: \$967.75

Total: \$967.75

Amount Due (USD): \$967.75

[Pay Securely Online](#)



link.waveapps.com/xsmx29-h4xaru

Notes / Terms
EIN 20-0847821



INVOICE

Steinotype, Inc.
PO Box 531108
Miami Shores, Florida 33153-1108
United States

Mobile: 305.632.4464
www.steinotype.com

Notes / Terms

Steinotype, Inc. does not abdicate payment responsibility to third parties. If collection action is necessary to obtain payment of this invoice, we shall be entitled to recover from payor all costs of collection, including interest, court costs, and reasonable attorney's fees.

THANK YOU!

**U.S. Legal Support
Court Reporters**



INVOICE

SE - MIAMI
16825 Northchase Drive Suite 900
Houston TX 77060
Phone: 305-373-8404 Fax: 305-358-1427

Peter Berlowe, Esquire
Assouline & Berlowe, P.A.
3250 Mary Street # 100
Miami FL 33133

Invoice No.	Invoice Date	Payment Terms
20230425940-12	5/18/2023	Net 30
Job No.	Job Date	Balance
6356591	5/8/2023	\$2,130.70
Case Name		
Michael J. Fitzgerald vs. Ronda McNae		
Case No.		
122CV22171JEM		

Job Location	Ordered By	Reference Info.
Foster Garvey PC 1111 3rd Avenue # 3000 Seattle WA 98101	Peter Berlowe, Esquire Assouline & Berlowe, P.A. 3250 Mary Street # 100 Miami FL 33133	Client Matter No: Claim No: Insured: D/O/L:

Services/Items	Units	Type	Rate	Charges
Items Covered: General				
RemoteDepo (Virtual Room)	1.00	N/A	\$295.00	\$295.00
Reporter Attendance Fee - 3 Hour Min	5.00	Hours	\$85.00	\$425.00
Shipping of Hard Copy Original, Copy, or Media - Standard	1.00	N/A	\$25.00	\$25.00
ORIGINAL TRANSCRIPT OF: Azaiah Carew				
Original	207.00	Pages	\$5.35	\$1,107.45
Condensed Transcript	1.00	N/A	\$35.00	\$35.00
Transcript Handling & Processing	1.00	N/A	\$70.00	\$70.00
Litigation Technology, Support and Security Management	1.00	N/A	\$60.00	\$60.00
Exhibit	131.00	Pages	\$0.75	\$98.25
Exhibits (Color)	10.00	Pages	\$1.50	\$15.00

Total Due	\$2,130.70
AFTER 7/2/2023 PAY	\$2,450.31
(-) Payments/Credits	\$0.00
(+) Finance Charges/Late Fees	\$0.00
(=) New Balance	\$2,130.70

Tax ID : 76-0523238 Nevada Firm Registration # 067F

Phone: 305-567-5576

Invoice not paid by due date is subject to interest of 1.5% per month. We will make reasonable efforts to allocate payments properly. U.S. Legal Support may recover any fees and costs it incurs in collecting any unpaid amounts. Any rights regarding allocations, refunds or adjustments after 90 days from payment shall be waived by payer.
 Review our Terms & Conditions for additional information at our website www.uslegalsupport.com.

"Please detach bottom portion and remit with payment."

Peter Berlowe, Esquire
Assouline & Berlowe, P.A.
3250 Mary Street # 100
Miami FL 33133

Invoice No.	20230425940-12
Job No.	6356591
Total Due	\$2,130.70

Invoice Date	5/18/2023
Case No.	122CV22171JEM

Remit To: **U.S. Legal Support, Inc.**
P.O. Box 4772
Houston, TX 77210

PAY BY CREDIT CARD



Cardholder's Name: _____

Card Number: _____

Exp. Date: _____ Phone: _____

Billing Address: _____

Zip: _____ Card Security Code: _____

Amount to Charge: _____

Cardholder's Signature: _____



INVOICE

SE - MIAMI
16825 Northchase Drive Suite 900
Houston TX 77060
Phone: 305-373-8404 Fax: 305-358-1427

Peter Berlowe, Esquire
Assouline & Berlowe, P.A.
3250 Mary Street # 100
Miami FL 33133

Invoice No.	Invoice Date	Payment Terms
20230426278-12	5/18/2023	Net 30
Job No.	Job Date	Balance
6356598	5/9/2023	\$1,994.00
Case Name		
Michael J. Fitzgerald vs. Ronda McNae		
Case No.		
122CV22171JEM		

Job Location	Ordered By	Reference Info.
Foster Garvey PC 1111 3rd Avenue # 3000 Seattle WA 98101	Peter Berlowe, Esquire Assouline & Berlowe, P.A. 3250 Mary Street # 100 Miami FL 33133	Client Matter No: Claim No: Insured: D/O/L:

Services/Items	Units	Type	Rate	Charges
Items Covered: General				
RemoteDepo (Virtual Room)	1.00	N/A	\$295.00	\$295.00
Reporter Attendance Fee - 3 Hour Min	4.25	Hours	\$85.00	\$361.25
Shipping of Hard Copy Original, Copy, or Media - Standard	1.00	N/A	\$25.00	\$25.00
Waiting Time	0.50	Hours	\$97.50	\$48.75
ORIGINAL TRANSCRIPT OF: Marissa Carew				
Original	190.00	Pages	\$5.35	\$1,016.50
Exhibit	64.00	Pages	\$0.75	\$48.00
Exhibits (Color)	23.00	Pages	\$1.50	\$34.50
Condensed Transcript	1.00	N/A	\$35.00	\$35.00
Transcript Handling & Processing	1.00	N/A	\$70.00	\$70.00
Litigation Technology, Support and Security Management	1.00	N/A	\$60.00	\$60.00
Total Due				\$1,994.00
AFTER 7/2/2023 PAY				\$2,293.10
(-) Payments/Credits				\$0.00
(+) Finance Charges/Late Fees				\$0.00
(=) New Balance				\$1,994.00

Tax ID : 76-0523238 Nevada Firm Registration # 067F

Phone: 305-567-5576

Invoice not paid by due date is subject to interest of 1.5% per month. We will make reasonable efforts to allocate payments properly. U.S. Legal Support may recover any fees and costs it incurs in collecting any unpaid amounts. Any rights regarding allocations, refunds or adjustments after 90 days from payment shall be waived by payer.
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"Please detach bottom portion and remit with payment."

Peter Berlowe, Esquire
Assouline & Berlowe, P.A.
3250 Mary Street # 100
Miami FL 33133

Invoice No.	20230426278-12
Job No.	6356598
Total Due	\$1,994.00

Invoice Date	5/18/2023
Case No.	122CV22171JEM

Remit To: **U.S. Legal Support, Inc.**
P.O. Box 4772
Houston, TX 77210

PAY BY CREDIT CARD

Cardholder's Name: _____

Card Number: _____

Exp. Date: _____ Phone: _____

Billing Address: _____

Zip: _____ Card Security Code: _____

Amount to Charge: _____

Cardholder's Signature: _____